EXHIBIT 3

Brian Quiros

From: Mike Zarba <mzarba@newmilford.org>
Sent: Wednesday, September 2, 2015 4:38 PM
To: Stephen Goldblum
Cc: Lizabeth Link
Subject: Fwd: Approval for Phase III Work
Attachments: Phase III Approval 09012015.pdf; May 22 e-mail_Town of New Milford Mail...pdf; Reponses to EPA Comments from 07 13 15 and 07 14 15 TRC.pdf; April 2 e-mail_Town of New Milford Mail...pdf; April 17 e-mail_Town of New Milford Mail...pdf; EPA Comment Letter April 2 2015.pdf; EPA Response Letter_4-17-15.PDF; July 13 & 14 e-mails_Town of New Milford Mail...pdf; July 31 e-mail_Town of New Milford Mail...pdf; June 12 e-mail_Town of New Milford Mail...pdf; Revised Page 2 of Table 5-3.pdf; Revised Page 5-5.pdf; Phase I PCB Plan T_B.pdf

Dear Steve:

Please find attached the approval from EPA for the Century Enterprise Center Demolition and Phase III cleanup project. Please review it and let me know ASAP if you have any any questions. Otherwise, please refer to item # 11. a. (on page 2 of 5 of Attachment 1) for which I will need that certification prior to (or at) the contract signing.

Additionally I have attached all of the e-mail correspondence (and attachments) referenced in Attachment 2. Again, please let me know of any questions ASAP.

Thank You,

Michael F. Zarba, P.E.
Public Works Director
Town of New Milford
(860) 355-6040 phone
(860) 355-6055 fax
www.newmilford.org/DPW

---------- Forwarded message ----------
From: **Tisa, Kimberly** <Tisa.Kimberly@epa.gov>
Date: Wed, Sep 2, 2015 at 10:54 AM
Subject: Approval for Phase III Work
To: Mike Zarba <mzarba@newmilford.org>

Cc: "Brown, Rudy" <Brown.Rudy@epa.gov>, "Gutro, Doug" <Gutro.Doug@epa.gov>

Mike:

Please find attached EPA's approval of the Phase III work for the CEC site. A hard copy is in the mail.

Should you have any questions, please feel free to contact me.

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)

USEPA

5 Post Office Square, Suite 100

Boston, MA 02109-3912

(o) 617.918.1527

(f) 617.918-0527

The analytical data is summarized in Table 5-2.

Transformer Area 3 (14 soil samples, 5 concrete samples):

Fourteen confirmatory soil samples and five confirmatory concrete samples were submitted for PCB analysis, locations shown on Figure 5-3. Six of the fourteen soil samples contained detections of PCBs. One of the six detections was in exceedance of 1.0 mg/Kg, T-3-SB-1-SW-2 at 1.1 mg/Kg.

Three of the five concrete samples contained detections of PCBs. None of the detections were in exceedance of 10 mg/Kg.

The analytical data is summarized in Table 5-3.

Transformer Area 4 & 4A (4: 5 soil, 5 concrete, 4A: 3 soil, 3 concrete):

Five confirmatory soil samples and five confirmatory concrete samples were submitted for PCB analysis for transformer area 4. Three confirmatory soil samples and three confirmatory concrete samples were submitted for PCB analysis for transformer area 4A. The sample locations for transformer area 4 and 4A are shown on Figure 5-4.

Three of the five soil samples in transformer area 4 contained detections of PCBs. None of the detections were in exceedance of 1.0 mg/Kg. One of the five concrete samples in transformer area 4 contained a detection of PCBs but it was below 10 mg/Kg.

Two of the three soil samples in transformer area 4A contained detections of PCBs, neither detection was in exceedance of 1.0 mg/Kg. All three concrete samples collected from transformer area 4A were non-detect for PCBs.

The analytical data is summarized in Table 5-4.

B-4 Area & B-19 Area (B-4: 3 soil, 2 concrete, B-19: 4 soil, 2 concrete):

Three soil samples and two concrete samples were submitted for PCB analysis following the removal of soil in the B-4 area. None of the samples submitted contained detections of PCBs.

The sample locations are depicted on Figure 5-5. The analytical data is summarized in Table 5-5.

Four soil samples and two concrete samples were submitted for PCB analysis following the removal of soil in the B-19 area. Two of the four soil samples contained detections of PCBs, neither detection was in exceedance of 1.0 mg/Kg. Both concrete samples contained detections of PCBs, neither detection was in exceedance of 10 mg/Kg.

The sample locations are depicted on Figure 5-6. The analytical data is summarized in Table 5-6.

5.3.2 AOC 10: Boiler Room

The soil contamination identified in the Marin Phase III ESA was not addressed in any of the four remedial phases summarized in this report. It was deemed environmentally isolated and an Environmental Land Use Restriction (ELUR) was proposed to address the contamination left in place.

If the building was to be demolished or the slab disturbed in the area of AOC-10, the contamination would have to be addressed at that time.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

SEP 0 1 2015

Honorable Patricia Murphy, Mayor
Town of New Milford
Town Hall
10 Main Street
New Milford, Connecticut 06776

Re: PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c)
Century Enterprise Center
New Milford, Connecticut
EPA ID: CTD000847707

Dear Mayor Murphy:

This is in response to the Town of New Milford (the "Town") notification[1] for approval of a proposed plan to address PCB contamination at the property known as the Century Enterprise Center located on Aspetuck Ridge Road in New Milford, Connecticut. The building contains PCB-contaminated materials that exceed the allowable PCB levels under 40 CFR § 761.61 for unrestricted use. The Town is proposing to remove all PCB-contaminated building materials and soil with greater than (">") 1 part per million ("ppm") and asbestos containing materials ("ACM") and then demolish the building (hereinafter the "Site").

In its Notification, the Town has proposed the following PCB and ACM abatement plan (see Notification Figure 3 for identified locations) based on the funding that is available:

- T4-6 concrete slab (to a minimum depth of 2 inches) will be removed and disposed of as a greater than or equal to ("≥") 50 ppm PCB waste;
- T1 soils located in SB-7A area and SB-9A area will be removed and disposed of as a ≥ 50 ppm and less than ("<") 50 ppm PCB waste, respectively;
- T3 soil shall be removed and disposed of as a < 50 ppm PCB waste;

[1] Information was prepared by TRC Environmental Corporation on behalf of the Town to satisfy the requirements under 40 CFR §§ 761.61(a) and (c). Attachment 2 provides a list of supporting information for the Phase III project ("Administrative Record") which EPA considered for this Approval. All submittals in their entirety are considered "the Notification".

- Building slab located at B38 and B39 sample locations will be removed and disposed as a < 50 ppm PCB waste;

- Building-wide milled concrete will be removed and disposed of as a < 50 ppm PCB waste;

- Drain lines, associated piping and residuals will be removed and disposed as a ≥ 50 ppm PCB waste or, alternatively additional sampling will be conducted to confirm PCB concentrations for off-site disposal;

- Acid lines and overlying concrete will be removed and disposed of as a < 50 ppm PCB waste;

- Exterior soil at sample location E4-B14 and outside the electrical room will be removed and disposed as a < 50 ppm PCB waste;

- Concrete foundation exterior to the electrical room will be removed and disposed as a < 50 ppm PCB waste;

- Concrete slab located in the lumber storage/box shop area will be removed and disposed as a < 50 ppm PCB waste; and,

- Verification samples will be collected from remaining soil and concrete to confirm PCB concentrations are ≤ 1 ppm.

The Town has determined that building caulk and glazing which have PCB concentrations at < 50 ppm meet the criteria for an *Excluded PCB Product* under § 761.3. Under the PCB regulations, *Excluded PCB Products* are authorized for use and thus there is no requirement for decontamination of surfaces that are in contact with the < 50 ppm PCB products. While these products are not addressed in this Approval, the Town is proposing to remove the PCB products containing PCBs with greater than (">") 1 ppm but < 50 ppm and to manage these products in accordance with the Connecticut Department of Energy and Environmental Protection ("CTDEEP") regulations.

In its Notification, the Town has proposed a minor deviation from the sampling required under Subpart O for concrete and sub-slab soils located in the lumber storage/box shop area. Based upon the sampling to-date and the additional, proposed sampling following concrete and soil removal, this sampling is reasonable for purposes of confirming that the PCB cleanup standard has been met.

The Town may proceed with its project in accordance with 40 CFR §§ 761.61(a) and (c); its Notification; and, this Approval, subject to the conditions of Attachment 1. If the current level of funding is insufficient to complete the above PCB-related activities, the PCB work remaining outstanding shall be completed when additional funding is available. In this event, the Town shall be responsible for securing the Site and ensuring that PCBs remaining at the Site are not posing an unreasonable risk to health or the environment.

EPA encourages the compliance with greener cleanup practices for all cleanup projects, and recommends adherence to the ASTM Standard Guide to Greener Cleanups E2893-13 ("Guide") for work conducted under this Approval and the Notification. Greener cleanups is the practice of integrating options that minimize the environmental impacts of cleanup actions in order to incorporate practices that maximize environmental and human benefit. Please see Section 6 of the Guide for the Best Management Practices ("BMP") Process dated December 19, 2013. (*See* www.astm.org/Standards/E2893.htm *for additional information*) EPA encourages you to review the Guide and implement any practices that are feasible. If implemented, the PCB completion report should include a section on BMP Documentation, as described in Section 6.6.5 of the Guide.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527 / Facsimile: (617) 918-0527

EPA shall not consider this project complete until it has received all submittals required under this Approval, including documentation that all PCBs with > 1 ppm have been removed and disposed of in accordance with 40 CFR § 761.61. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

Acting Deputy Director

Nancy Barmakian, Acting Director
Office of Site Remediation & Restoration

cc: Michael Zarba, Director Town of New Milford DPW
Ed Doubleday, TRC Environmental Corporation
Gary Trombly, CTDEEP
File

Attachment 1 – PCB Approval Conditions
Attachment 2 – Administrative Record ("Notification")

ATTACHMENT 1:

PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS
CENTURY ENTERPRISE CENTER ("the Site")
ASPETUCK ROAD
NEW MILFORD, CONNECTICUT

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB remediation waste* located at the Site and identified in the Notification [2].

2. The Town of New Milford ("the Town") shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.

3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.

4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.

5. The Town must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, the Town shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.

6. The Town is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the Town has or receives information indicating that the Town or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.

---

[2] Information was prepared by TRC Environmental Corporation on behalf of the Town to satisfy the requirements under 40 CFR §§ 761.61(a) and (c). Attachment 2 provides a list of supporting information for the Phase III project ("Administrative Record") which EPA considered for this Approval. All submittals in their entirety are considered "the Notification".

7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the Town are authorized to conduct the activities set forth in the Notification. The Town is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.

8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release the Town from compliance with any applicable requirements of federal, state or local law; or 3) release the Town from liability for, or otherwise resolve any violations of federal, state or local law.

9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

NOTIFICATION AND CERTIFICATION CONDITIONS

10. This Approval may be revoked if the EPA does not receive written notification from the Town of its acceptance of the conditions of this Approval within 10 business days of receipt.

11. The Town shall submit the following information for EPA review and/or approval:

    a. a certification signed by its selected abatement/demolition contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;

    b. a contractor work plan, prepared and submitted by the selected demolition or abatement contractor(s) describing the activities that will be employed during abatement activities. At a minimum, this work plan should include details on containment and air monitoring; details on PCB waste storage, handling, and disposal; and, details on decontamination of field equipment and any other PCB-contaminated materials;

    c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and quality assurance requirements specified in the Notification and in this Approval.

CLEANUP AND DISPOSAL CONDITIONS

12. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools or construction of a negative air containment system with a HEPA ventilation system to control emissions, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.

13. The PCB cleanup standard for *porous surfaces* (i.e., concrete) and soil shall be less than or equal to ("≤") 1 part per million ("ppm") for unrestricted use or disposal. The PCB cleanup standard for *non-porous surfaces* (e.g., overhead cranes, steel beams) shall be less than ("<") 10 μg/100 cm^2 for unrestricted disposal and/or recycling.

    a. PCB-contaminated wastes shall be removed and disposed of as detailed in the Notification, except as follows:

        i) Concrete overlaying soil located in the T1 SB-7A area and T1 SB-9A area as shown on Figure 3 of the Notification shall be removed and disposed of as a greater than or equal to ("≥") 50 ppm and < 50 ppm PCB waste, respectively or alternatively, shall be sampled to determine PCB disposal requirements.

        ii) Steel beams shall be disposed of as a ≥ 50 ppm PCB waste or alternatively shall be sampled to determine PCB disposal requirements.

        iii) If samples are collected, sampling analytical results and proposed waste disposal details shall be submitted to EPA for review prior to removal of these wastes from the Site.

    b. Verification samples for *porous surfaces* (e.g., concrete) shall be performed on a bulk basis (i.e., mg/kg). Verification sampling for *porous surfaces* shall be conducted in accordance with the EPA Region 1 Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, dated May 5, 2011, at a maximum depth interval of 0.5 inches. Samples shall be collected at the frequency detailed in the Notification.

        i) Following initial scarification of the T4-6 concrete slab, samples shall be collected in accordance with the Subpart O sampling frequency to confirm that the ≥ 50 ppm PCBs have been removed. If the sample results confirm PCB concentrations are < 50 ppm, the remaining greater than (">") 1 ppm PCB-contaminated T4-6 concrete may be removed and disposed as a < 50 ppm PCB waste. Alternatively, all T4-6 PCB-contaminated concrete shall be disposed as a ≥ 50 ppm PCB waste.

c. Verification samples for bulk *PCB remediation waste* (i.e., soil) shall be collected on a bulk basis (i.e., mg/kg) and reported on a dry weight basis. Soil samples shall be collected at the frequency detailed in the Notification and from both excavation bottoms and sidewalls, as applicable.

d. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 for solid matrices and Method 3500B/3510C for aqueous matrices; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated in accordance with Subpart Q.

14. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with CFR 40 CFR § 761.40; stored in a manner consistent with 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61, unless otherwise specified below.

a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).

b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).

c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under 40 CFR § 761.60.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

15. The Town shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the Town to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

16. Approval for these activities may be revoked, modified or otherwise altered: if EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; or, if EPA finds that these activities pose an unreasonable risk to health or the environment.

17. Any proposed modification(s) in the plan, specifications, or information in the Notification must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii).

18. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

19. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

RECORDKEEPING AND REPORTING CONDITIONS

20. The Town shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup and disposal and the analytical sampling shall be established and maintained by the Town in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.

21. The Town shall submit a final PCB Completion Report ("Report") as both a hard copy and electronic version, to the EPA within 60 days of completion of the activities authorized under this Approval. At a minimum, this Report shall include: a short narrative of the project activities with photo-documentation and Greener Cleanups BMP documentation; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of; copies of manifests and bills of lading; and copies of certificates of disposal or similar certifications issued by the disposer.

22. Required submittals shall be mailed to:

    Kimberly N. Tisa, PCB Coordinator
    United States Environmental Protection Agency
    5 Post Office Square, Suite 100 – (OSRR07-2)
    Boston, Massachusetts 02109-3912
    Telephone: (617) 918-1527
    Facsimile: (617) 918-0527

23. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

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END OF ATTACHMENT 1

ATTACHMENT 2

ADMINISTRATIVE RECORD ("NOTIFICATION")
CENTURY ENTERPRISE CENTER
NEW MILFORD, CONNECTICUT

Phase I PCB Source Removal Notification, December 2004

Addendum to Phase I Notification and Response to EPA comments, March 2, 2005

Phase II PCB Remediation Plan, Final, December 18, 2006

Soil analytical data for entry way outside electrical room, transmitted via email December 6, 2007

Interim Remedial Action Report, September 2014

Modified Self-Implementing Phase III PCB Remediation Plan, January 2015

Kimberly Tisa (USEPA) to Michael Zarba (Town of New Milford), EPA comments on January 2015 Modified Self-Implementing Phase III PCB Remediation Plan (received February 10, 2015), via email April 2, 2015

Michael Zarba (Town of New Milford) to Kimberly Tisa (USEPA), Responses to April 2, 2015 EPA comments on January 2015 Modified Self-Implementing Phase III PCB Remediation Plan, April 17, 2015

Michael Zarba (Town of New Milford) to Kimberly Tisa (USEPA, Summary of waste disposal volumes, via email dated May 22, 2015

Transmittal of revised Page 5-5 and Table 5-3 for Interim Remedial Action Report dated September 2014, via email dated June 12, 2015

Kimberly Tisa (USEPA) to Michael Zarba (Town of New Milford), EPA comments on January 2015 Modified Self-Implementing Phase III PCB Remediation Plan and April 17, 2015 Responses to EPA comments, via emails July 13 and July 14, 2015

Michael Zarba (Town of New Milford) to Kimberly Tisa (USEPA), Responses to July 13, 2015 EPA comments on January 2015 Modified Self-Implementing Phase III PCB Remediation Plan and April 17, 2015 Responses to EPA comments, July 31, 2015

Mike Zarba <mzarba@newmilford.org>

Century Enterprise Center - New Milford, CT

1 message

Mike Zarba <mzarba@newmilford.org> Fri, May 22, 2015 at 3:11 PM
To: "Tisa, Kimberly" <Tisa.Kimberly@epa.gov>

Hi Kim:

As a follow up to the answer we provided for comment # 1, I have asked Jim Olsen at Tighe & Bond to review the test sample data provided in their IRAR and to confirm this data and/or update it as needed. I am expecting an answer from him sometime early next week on this.

In addition, regarding comment # 12 the Table below which is from the bid form, summarizes the waste disposal volumes for the drain line removal. I believe these were omitted from our initial response. These volumes are consistent with the disposal volumes included in the original phase 2 plan which had been approved by EPA. This scope was deleted in the Rebid for phase 2.

Description	Estimated Quantity
Contaminated Material Excavation - Concrete, Acid lines, Floor Drains and Piping	500 tons
Contaminated Material Excavation Interior Soil	50 tons
Transportation and Disposal of Bulk PCB Remedial Waste, Floor Drains and Piping, Asphalt, Concrete, Soil containing PCB contamination > or equal to 50 mg/Kg	150 tons
Transportation and Disposal of Bulk PCB Remedial Waste, Floor Drains and Piping, Asphalt, Concrete, Soil containing PCB contamination <50 mg/Kg	400 tons

If you need any additional information or clarification on any of these items please feel free to call or e-mail me. Thank you for your time and effort in reviewing our project.

Take Care,

Michael F. Zarba, P.E.
Public Works Director
Town of New Milford
(860) 355-6040 phone
(860) 355-6055 fax
www.newmilford.org

TRC Reponses to EPA Comments from 07.13.15 and 07.14.15 emails

EPA COMMENT 07.13.15 – #1

For the T-1 area, following removal of the soil, we need to discuss the verification sampling. Currently, it's 5-foot intervals with compositing. As the delineation is not complete here, I don't believe that compositing is supported, but we can discuss.

TRC RESPONSE 07.13.15 – #1

Based on discussions during the conference call with EPA on July 27, 2015, TRC hereby removes the provision of the Modified Phase III SIP/notification that allows for compositing of confirmatory/verification soil samples for the former T-1 transformer area. This change is proposed to be more conservative in light of the unrestricted use goal targeted for Phase III, and the fact that elevated concentrations (up to 190 ppm) were found to remain at the limits of excavation at this location. Please consider the Modified Phase III SIP/notification amended accordingly. Please also note that TRC is assuming that the only exceedances that remain are those identified in Table 5-1 of Tighe & Bonds' IRAR.

EPA COMMENT 07.13.15 – #2

For the lumber storage area, following removal, it appears that a 50' soil verification sampling frequency is proposed. If so, could you clarify how the composite samples would be collected?

TRC RESPONSE 07.13.15 – #2

Since the entire slab in this area would be removed in this area (approximately 9,000 square feet) TRC originally proposed to simply project applicable 50-foot slab surface sampling grid (i.e., grid points CS-4a, CS-4b, CS-10a, CS-10b, and CS-10c) onto the subslab soil to demonstrate that underlying soils were not impacted above 1 ppm. For added conservatism in light of the unrestricted use goal targeted for Phase III, TRC agrees that further consideration of the subslab soil sampling frequency and compositing strategy for this proposed 9,000 square foot area is warranted. During the conference call on July 27, 2015, EPA had indicated a verification soil sampling frequency of 5 feet would apply under Subpart O. However, given that the available data (samples B-9, B-13, B-35, B36, and B-37) do not show any exceedances of the 1 ppm limit in the upper 6 inches of subslab soil, TRC proposes, upon removal of the slab, to address the subslab soil (and foundations if encountered) as a separate/distinct area from the overlying concrete slab, by first performing delineation on a 10-foot grid (discrete samples from upper three inches of subslab soil or, in the case of foundations, upper ½ inch of concrete). The intent would be to assess the sufficiency of existing site characterization data as described in Subpart N. This would result in approximately 90 delineation samples for the proposed 9,000 square foot area. Where exceedances, if any, of the 1 ppm limit were identified, the associated areas would be removed and subjected to verification sampling on a 5-foot grid (discrete samples from upper three inches of soil at limits of removal, or, in the case of foundations, upper ½-inch of concrete). No compositing of samples is proposed.

Lastly, with regard to sampling of the concrete slab at the cut line, TRC proposes to increase the number of verification samples beyond the originally planned scope. TRC had originally proposed to collect and composite samples on a 50-foot spacing from the bottom side of the slab only and composite them, resulting in a single composite consisting of four bottom-of-slab samples. Based on further

consideration, TRC instead proposes to collect verification samples, each to be analyzed without compositing, every 25-feet along the cut line from both the top and bottom ½-inch of the slab. This would result in approximately 16 discrete concrete samples from the cut line.

EPA COMMENT 07.13.15 – #3

Following removal of 1" of the building-wide concrete, composite sampling on a 50-foot center is proposed. The notification indicates that each composite would contain 4 to 5 discrete samples and with an actual level of 0.25 ppm. If the composite contains 5 samples, the action level would be 0.2 ppm, not 0.25 ppm.

TRC RESPONSE 07.13.15 – #3

TRC had indicated in Section 2.5 of the Modified Phase III SIP/notification that the top-of-slab composite samples would be comprised of 4 to 5 samples, and that in the former case of 4 samples, the action level would be 0.25 ppm. This was provided as an example, and was not intended to imply that the exact same action level would apply if the composite consisted of 5 samples (or some other quantity). The action level in all cases will be 1 ppm divided by the number of equal-weight samples comprising the composite. In any case, TRC would like to clarify that based on the slab surface compositing scheme shown on TRC's Figure 2 of the Phase III Modified SIP, there are a few areas where the composites may only consist of 3 samples (not 4 or 5). This is a clarification of a minor discrepancy between the SIP text and Figure 2.

EPA COMMENT 07.13.15 – #4

Given the above questions on composite sampling, it would be helpful if one or two examples of the compositing scheme for soils and concrete could be provided for clarification.

TRC RESPONSE 07.13.15 – #4

Based on discussions with the EPA on July 27, 2015, it is TRC's understanding that there were two main areas where further clarification was desired: the former T-1 transformer area, and the lumber storage area. As discussed in the responses for Comment #1 and #2 above, compositing of verification samples is no longer proposed for the either of these areas.

EPA COMMENT 07.13.15 – #5

Please confirm EPA's understanding of waste disposal as follows:

- T4-6 concrete slab will be removed/disposed as a >/= 50 ppm PCB waste;
- T1 soils (SB-7A and SB-9A areas) will be removed/disposed as a >/= 50 ppm PCB waste;
- Building-wide milled concrete will be removed/disposed as a < 50 ppm PCB waste;
- Drain lines, associated piping and residual will be removed/disposed as a >/= 50 ppm PCB waste;
- Acid lines and overlying concrete will be removed/disposed as a < 50 ppm PCB waste;
- Soil at E4-B14 to be removed/disposed as a < 50 ppm PCB waste;
- Soils exterior to the electrical room will be removed/disposed as a < 50 ppm PCB waste;
- Concrete foundation exterior to the electrical room to be removed/disposed as a < 50 ppm PCB waste; and,
- Concrete slab removed in the lumber storage area to be disposed as a < 50 ppm PCB waste

TRC RESPONSE 07.13.15 – #5

The above items generally match TRC's anticipated waste stream categories as proposed in the Modified Phase III SIP/notification, except that the data reported for T-1-SB-9(A) supports disposal of associated

soil as < 50 ppm waste. In addition, please be advised that the characterization of the floor drains and associated piping as >/= 50 ppm PCB waste was extracted from Tighe & Bonds' Phase II SIP. However, based on the data presented in Table 4 of said Phase II SIP, for each of the floor drain/catch basin locations that were sampled and which have not yet been removed, results were consistently below 50 ppm mg/kg. Therefore, TRC proposes to allow the Contractor the option to propose a sampling regime in their work plan which confirms the PCB concentrations in residuals of all drain lines to be disposed, and potentially allows for disposal of some of the drain lines as less than 50 ppm PCB waste. As discussed, the Contractors Work Plan(s) is subject to review and approval by the Town and EPA.

EPA COMMENT 07.13.15 – #6

The notification indicates that the overhead cranes had PCBs at > 10 µg/100 cm^2 and would be disposed in a non-TSCA facility and may be decontaminated. What are the PCB concentrations on the cranes? Are the PCBs in the paint rather than in dust?

TRC RESPONSE 07.13.15 – #6

The PCB concentrations on the remaining overhead cranes, as presented in Tighe & Bonds's IRAR range from "ND" to 4,500 (Samples C101-C109, C201-C209, C301-C305, and C401-C405). The units are presented as in terms of "mg/kg" in Table 6-5 and "ug/wipe" in Appendix E of the IRAR. Half of the twenty eight wipe sample results indicated "ND" and the other half indicated concentrations of 1,000 or higher. Presumably the results are based hexane extraction with standard 100 cm^2 wipes, but this was not documented.

Tighe & Bond concluded in Section 5.8 of the approved Phase 1 PCB Source Removal Plan that the original "source of PCB contamination on the cranes is inferred to be the oil reservoirs and gearboxes on the cranes". A copy of the text from this plan is attached for your reference.

Consistent with the Phase I and Phase II approach for non-porous materials, the Modified Phase III SIP/notification had indicated that the overhead cranes would be decontaminated as needed, verified by wipe sampling, and disposed offsite at a non-TSCA facility. The means and methods for crane decontamination and disposition for disposal or recycling will be specified by the Contractor in their Work Plan(s) and would be subject to review and approval by the Town and EPA.

EPA COMMENT 07.13.15 – #7

Clarification on removal/disposal of concrete at B38 and B39 locations is requested.

TRC RESPONSE 07.13.15 – #7

These were areas where Tighe & Bond had identified that PCBs penetrated completely through the slab at actionable levels, and into the subslab soil at nonactionable levels (i.e., less than 1 ppm). Although it is anticipated that these areas are relatively small, it does not appear that they were subsequently delineated on a tighter grid spacing. TRC therefore proposed in the Modified Phase III SIP/notification to start with 10-foot delineation grid boxes focusing on the underside of the slab in each area. The delineation would be expanded on 10-foot grids as needed, and then the concrete would be removed as needed. The verification samples would be based on 5-foot grids. TRC proposes to increase the scope of the delineation sampling by requiring 10-foot grid samples from *both* the top of the slab and the bottom of slab, instead of just the bottom of the slab.

EPA COMMENT 07.13.15 – #8
The notification indicates that the < 50 ppm PCB caulk/glazing is a CT-regulated waste and that it will be removed prior to building demolition. Please clarify where this waste will be disposed of.
TRC RESPONSE 07.13.15 – #8
Disposal location(s) will be determined by the Contractor, subject to approval, based on available data. This information will be presented in the Contractor's Work Plan(s).

EPA COMMENT 07.13.15 – #9
Just a note for your consideration, for the steel beams, etc, and for recycling, do we need to be concerned about contamination from dust, etc?
TRC RESPONSE 07.13.15 – #9
As discussed during the July 27, 2015 conference call, TRC agrees that contamination from dust should be considered. Tighe & Bond has previously categorized the steel beams as "non-porous" and conducted wipe samples as also reported in Section 5.8 of the Phase I plan (attached). From an on-site health and safety standpoint, dust will be monitored and controlled during the work by the Contractor and the Contractor will be responsible for compliance with all applicable waste disposal requirements. These plans will be specified in the Contractors Work Plan(s) which are subject to the Town and EPA approval.

EPA COMMENT 07.14.15 – #1
TRC Figure 3. For the T-1 area there is reference to T-1-SB-9(A) and the T&B IRAR. On Figure 5-1 of the IRAR, there is no sample location indicated as T-1-SB-9(A), but rather T-1-SB-8(A) within the SB-9 grid. EPA assumes that there is a typo in the IRAR and that the sample should be T-1-SB-9(A) within the SB-9 grid.
TRC RESPONSE 07.14.15 – #1
That is also TRC's assumption, based on the data reported in Table 5-1 of the IRAR.

EPA COMMENT 07.14.15 – #2
TRC Figure 3. For the Electrical Room (shown as Inset A) in the T&B IRAR, sample location E1 OB SW9 appeared to show a PCB concentration of 1.9 ppm and is also shown in Table 6-1 of the IRAR. However, it is not shown on the TRC Figure 3 as a sampling location with > 1 ppm. What is shown on Figure 3 is E1-OB-SW6 with a PCB concentration of 1.44 ppm. On page 5-6 of the IRAR, Section 5.4.1, 2nd paragraph, it indicates that additional soil removal occurred in this area and that the February 12, 2008 results were ND for PCBs.
TRC RESPONSE 07.14.15 – #2
Sample E1 OB SW9 is reported as having a PCB concentration of 0.51 ppm, not 1.9 ppm. The sample listed as having a concentration of 1.9 ppm is E1 SW9, which is not shown on the figure, and is presumed to have been excavated/removed as discussed in the IRAR text and the footnote in Table 6-1. TRC's interpretation of the IRAR is that the remaining sidewall sample in the area that may contain an exceedance is E1 OB SW6, which is listed in Table 6-1 and the lab data as having a concentration of 1.44 ppm PCBs. TRC agrees with EPA that the IRAR report text indicates that this particular sidewall sample was excavated. However, the IRAR does not indicate the new limits of excavation, and does not appear to call out the associated (February 2008) "ND" sample results in the tables or lab data, at least in a way

that clearly identifies the applicable designation of the new sample. Therefore, to be conservative, TRC felt that it would be prudent to collect a sample in the vicinity E1 OB SW6 as part of the Phase III work.

EPA COMMENT 07.14.15 – #3

Please clarify the reason for the soil excavation proposed at sample location E4-B14. Table 6-4 of the IRAR indicates that the soil sample was 0.55 ppm and thus < 1 ppm.

TRC RESPONSE 07.14.15 – #3

TRC's interpretation of Tighe & Bond's IRAR is that sample E4-B14 is a composite of two discrete, adjacent grab sample locations as appears to be indicated on Figure 6-4 of the IRAR. The adjusted, targeted remedial endpoint for a two-sample composite is 0.50 ppm, and therefore the result of 0.55 ppm represents an exceedance.

EPA COMMENT 07.14.15 – #4

For the Lumber Storage and Box Shop, there is reference to Figure 2 for sub-slab sampling locations. EPA was unable to find these sample locations on Figure 2. Please clarify.

TRC RESPONSE 07.14.15 – #4

Please be advised that Lumber Shop/Box Shop slab and subslab sampling locations shown or described on Figures 2 and 3, respectively, would be amended as proposed in TRC's responses to EPA's 07.13.15 comments.

EPA COMMENT 07.14.15 – #5

For sample location B-38, it is indicated that delineation samples will be collected from the bottom of the slab at each grid corner point and from the subslab soil. There is also reference to additional delineation on a 10-foot grid. The same work will also be conducted at B-39. Please clarify why both are post-milling delineation samples and how each set of data will be used.

TRC RESPONSE 07.14.15 – #5

Due to the penetration of PCBs through the entire floor slab thickness in these two areas, milling alone will not address the residual exceedances. Most of the targeted subslab excavation work, including the work at B-38 and B-39, is proposed to be performed after milling to minimize potential safety issues and impact on milling equipment associated with open excavations, etc. The associated data will be collected and used as described in TRC's responses to EPA's 07.13.15 comments.

Mike Zarba <mzarba@newmilford.org>

Re: Interim Remedial Action Report

1 message

Mike Zarba <mzarba@newmilford.org> Fri, Jul 31, 2015 at 3:41 PM
To: "Tisa, Kimberly" <Tisa.Kimberly@epa.gov>
Cc: "Trombly, Gary" <Gary.Trombly@ct.gov>, "Doubleday, Edward" <EDoubleday@trcsolutions.com>

Hi Kim:

In follow up to our conference call on Monday July 27, I have attached written responses from TRC to the questions contained in your e-mails of 7/13 and 7/14. As part of the responses TRC has referenced portions of the Tighe & Bond Phase I Source Removal Plan, therefore I have included a PDF of the text portion (no tables, figures, etc) of that document for your use and reference and as part of the record.

Please let me know if you have any questions or if you need any additional information, and again thank you for your time and attention to this project.

Take Care,

Michael F. Zarba, P.E.
Public Works Director
Town of New Milford
(860) 355-6040 phone
(860) 355-6055 fax
www.newmilford.org

On Tue, Jul 14, 2015 at 11:28 AM, Tisa, Kimberly <Tisa.Kimberly@epa.gov> wrote:

Mike:

A few additional comments for consideration. I've tried to go back through the Phase 1 and Phase 2 submittals, but it's time consuming and I need to make sure we're all on the same page for the Phase III.

As you and I discussed, the overall objective for Phase III is to remove all PCBs within the building footprint to achieve a < 1 ppm PCB cleanup standard. You believe the monies that the Town currently have will be sufficient for this. Based on this, any approval issued by EPA will have this as the primary objective with a contingency to leave higher PCB concentrations under a low occupancy area use (see § 761.3 definition) if the < 1 ppm cannot be achieved or if monies are insufficient. Depending upon the PCB concentrations remaining and the uncertainty of when development may occur, if PCBs > 1 ppm remain at the Site

following the Phase III work, additional controls may be necessary and the Town will need to record a deed notice to document site conditions.

I know you had indicated that you thought this would address everything, but just to let you know, there are still issues within at least 1 of the outfalls and perhaps the piping outside the building that would remain outstanding, I believe.

Additional Comments:

1. For the T-1 area, following removal of the soil, we need to discuss the verification sampling. Currently, it's 5-foot intervals with compositing. As the delineation is not complete here, I don't believe that compositing is supported, but we can discuss.

2. For the lumber storage area, following removal, it appears that a 50' soil verification sampling frequency is proposed. If so, could you clarify how the composite samples would be collected.

3. Following removal of 1" of the building-wide concrete, composite sampling on a 50-foot center is proposed. The notification indicates that each composite would contain 4 to 5 discrete samples and with an actual level of 0.25 ppm. If the composite contains 5 samples, the action level would be 0.2 ppm, not o.25 ppm.

4. Given the above questions on composite sampling, it would be helpful if one or two examples of the compositing scheme for soils and concrete could be provided for clarification.

5. Please confirm EPA's understanding of waste disposal as follows:

- T4-6 concrete slab will be removed/disposed as a >/= 50 ppm PCB waste
- T1 soils (SB-7A and SB-9A areas) will be removed/disposed as a >/= 50 ppm PCB waste
- Building-wide milled concrete will be removed/disposed as a < 50 ppm PCB waste
- Drain lines, associated piping and residual will be removed/disposed as a >/= 50 ppm PCB waste
- Acid lines and overlying concrete will be removed/disposed as a < 50 ppm PCB waste
- Soil at E4-B14 to be removed/disposed as a < 50 ppm PCB waste
- Soils exterior to the electrical room will be removed/disposed as a < 50 ppm PCB waste
- Concrete foundation exterior to the electrical room to be removed/disposed as a < 50 ppm PCB waste
- Concrete slab removed in the lumber storage area to be disposed as a < 50 ppm

6. The notification indicates that the overhead cranes had PCBs at > 10 µg/100 cm2 and would be disposed in a non-TSCA facility and may be decontaminated. What are the PCB concentrations on the cranes? Are the PCBs in the paint rather than in dust?

7. Clarification on removal/disposal of concrete at B38 and B39 locations is requested

8. The notification indicates that the < 50 ppm PCB caulk/glazing is a CT-regulated waste and that it will be removed prior to building demolition. Please clarify where this waste will be disposed of.

9. Just a note for your consideration, for the steel beams, etc, and for recycling, do we need to be concerned about contamination from dust, etc?

Thanks for your patience on this, but EPA needs to be clear on what is being done for this phase of work.

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)

USEPA

5 Post Office Square, Suite 100

Boston, MA 02109-3912

(o) 617.918.1527

(f) 617.918-0527

From: Tisa, Kimberly
Sent: Monday, July 13, 2015 4:58 PM
To: 'Mike Zarba'
Cc: 'Trombly, Gary'; Tisa, Kimberly
Subject: RE: Interim Remdial Action Report

Mike:

I have gone back through the Tighe & Bond report, your proposed plan and the responses to EPA's comments. I am still a little confused on exactly what is being done and why. As TRC put this together it may help us to have a discussion with them. In the meantime, I provide the following as points of discussion.

1. TRC Figure 3. For the T-1 area there is reference to T-1-SB-9(A) and the T&B IRAR. On Figure 5-1 of the IRAR, there is no sample location indicated as T-1-SB-9(A), but rather T-1-SB-8(A) within the SB-9 grid. EPA assumes that there is a typo in the IRAR and that the sample should be T-1-SB-9(A) within the SB-9 grid.

2. TRC Figure 3. For the Electrical Room (shown as Inset A), in the T&B IRAR, sample location E1 OB SW9 appeared to show a PCB concentration of 1.9 ppm and is also shown in Table 6-1 of the IRAR. However, it is not shown on the TRC Figure 3 as a sampling location with > 1 ppm. What is shown on Figure 3 is E1-OB-SW6 with a PCB concentration of 1.44 ppm. On page 5-6 of the IRAR, Section 5.4.1, 2nd paragraph, it indicates that additional soil removal occurred in this area and that the February 12, 2008 results were ND for PCBs.

3. Please clarify the reason for the soil excavation proposed at sample location E4-B14. Table 6-4 of the IRAR indicates that the soil sample was 0.55 ppm and thus < 1 ppm.

4. For the Lumber Storage and Box Shop, there is reference to Figure 2 for sub-slab sampling locations. EPA was unable to find these sample locations on Figure 2. Please clarify.

5. For sample location B-38, it is indicated that delineation samples will be collected from the bottom of slab at each grid corner point and from the subslab soil. There is also reference to additional delineation on a 10-foot grid. The same work will also be conducted at B-39. Please clarify why both are post-milling delineation samples and how each set of data will be used.

My apologies for continued questions, but it is very difficult to follow all the nuances as presented and I need to make sure both EPA and CTDEEP understand what is to be conducted under Phase III.

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)

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From: Mike Zarba [mailto:mzarba@newmilford.org]
Sent: Friday, June 12, 2015 8:18 AM
To: Tisa, Kimberly

Cc: Trombly, Gary; Doubleday, Edward
Subject: Fwd: Interim Remdial Action Report

Good Morning Kim:

Please find attached the reply and revised IRAR pages from Jim Olsen at Tighe & Bond in reference to comment # 1 of your April 2, 2015 review. This confirms your original finding that this sample location was inconsistent in the original report. Please replace the two pages with the revised updated pages attached hereto.

I believe this was the last bit of information you were looking for in reference to your original review, however if you need any additional information please do not hesitate to contact me.

Again, thank you for your time and attention in reviewing this project. Take Care,

Michael F. Zarba, P.E.

Public Works Director

Town of New Milford

(860) 355-6040 phone

(860) 355-6055 fax

www.newmilford.org

——— Forwarded message ———
From: **James T. Olsen** <JTOlsen@tighebond.com>
Date: Thu, Jun 11, 2015 at 7:10 PM
Subject: RE: Interim Remdial Action Report
To: Mike Zarba <mzarba@newmilford.org>

Hi Mike,

Sorry for delay on this. You are correct and that is a mistake. Attached are the revised pages.

Please let me know if you need anything else.

Jim

From: Mike Zarba [mailto:mzarba@newmilford.org]
Sent: Tuesday, April 21, 2015 1:56 PM
To: James T. Olsen
Subject: Interim Remdial Action Report

Jim:

As we discussed can you please confirm that the appropriate information is contained in the IRAR and/or update the appropriate information as follows?

EPA had commented about an inconsistency of data presented in that report. Specifically regarding a test sample (T-3-SB-1-SW-2) which is referenced on page 5-5 of your narrative as T-3-SB-1-SW-3 - I believe that should reference T-3-SB-1-SW-**2**. The narrative states that this sample exceeded the 1.0 mg/Kg limit at 1.1 mg/Kg, however the corresponding table (Table 5-3) shows a ND for this sample.

I included scans of the three pages and have highlighted the areas that I believe need confirmation and/or updating. Again can you please check this information and issue the appropriate changes, if

necessary.

Please let me know if you have any questions.

Thank You,

Michael F. Zarba, P.E.

Public Works Director

Town of New Milford

(860) 355-6040 phone

(860) 355-6055 fax

www.newmilford.org

---

2 attachments

Reponses to EPA Comments from 07 13 15 and 07 14 15 TRC.pdf
158K

Phase I PCB Plan T_B.pdf
1770K

Mike Zarba <mzarba@newmilford.org>

Re: Comments on Century Enterprise Center Phase III PCB Plan

1 message

Mike Zarba <mzarba@newmilford.org> Fri, Apr 17, 2015 at 2:41 PM
To: "Tisa, Kimberly" <Tisa.Kimberly@epa.gov>
Cc: "Trombly, Gary" <Gary.Trombly@ct.gov>, "Doubleday, Edward" <EDoubleday@trcsolutions.com>

Kim:

Attached is our reply to the comments from the April 2, 2015 review of the Phase III PCB Plan. A hard copy is being sent via US Mail, which will contain the CD with additional information referenced in the reponses.

Please let me know if you have any additional questions or require any additional information. Thank You,

Michael F. Zarba, P.E.
Public Works Director
Town of New Milford
(860) 355-6040 phone
(860) 355-6055 fax
www.newmilford.org

On Thu, Apr 2, 2015 at 1:55 PM, Tisa, Kimberly <Tisa.Kimberly@epa.gov> wrote:

Mike:

As discussed this morning, attached are EPA's comments on the Phase III PCB Plan dated January 2015, which EPA received in February 2015.

Hard copy to follow via mail.

Should you have any questions, please feel free to contact me.

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)

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EPA Response Letter_4-17-15.PDF
802K

Mike Zarba <mzarba@newmilford.org>

Comments on Century Enterprise Center Phase III PCB Plan

1 message

Tisa, Kimberly <Tisa.Kimberly@epa.gov> Thu, Apr 2, 2015 at 1:55 PM
To: "mzarba@newmilford.org" <mzarba@newmilford.org>
Cc: "Trombly, Gary" <Gary.Trombly@ct.gov>, "Tisa, Kimberly" <Tisa.Kimberly@epa.gov>

Mike:

As discussed this morning, attached are EPA's comments on the Phase III PCB Plan dated January 2015, which EPA received in February 2015.

Hard copy to follow via mail.

Should you have any questions, please feel free to contact me.

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)

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EPA Comment Letter April 2 2015.pdf
847K

Table 5-3
AOC 7: Interior Transformer Release Areas
Post-excavation Results - Transformer #3
Interim Remedial Action Report
Century Enterprise Center
New Milford, Connecticut

Parameter	Cleanup Criteria	T-3-SB-1-SW-1 4/30/06	T-3-SB-1-SW-2 4/30/06	T-3-SB-1-SW-3 4/30/06	T-3-SB-1-SW-4 4/30/06	T-3-W-1 (WIPE) 4/30/06	T-3-C-Comp #1 12/7/05	T-3-C-Comp-C-1 (a) 2/20/06	T-3-C-Comp #2 12/7/05	T-3-C-Comp #3 12/7/05	T-3-C-Comp #4 12/7/05
PCBs (mg/kg)											
Aroclor 1016	NE	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1221	NE	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1232	NE	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1242	NE	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1248	NE	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1254	NE	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1260	NE	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.31
Aroclor 1262	NE	ND	1.1	ND	ND	ND	1.5	ND	0.33	ND	ND
Aroclor 1268	NE	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Total PCBs	1[1,2]	ND	1.1	ND	ND	ND	1.5	ND	0.33	ND	0.31

PCBs - Polychlorinated Biphenyls
CTDEP - Connecticut Department of Environmental Protection
RES DEC - Residential Direct Exposure Criteria
mg/kg - milligrams per kilograms or parts per million
ND - Not Detected
NE - Not Established
[1] Standard for concrete (COMP) samples is 10 mg/kg
[2] Standard for the WIPE sample is 10 ug/m²

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

April 2, 2015

Town of New Milford
Attn: Michael Zarba, Director Public Works
10 Main Street
New Milford, Connecticut 06776

Re: Century Enterprise Center, New Milford
PCB Self-Implementing Phase III Remediation Plan

Dear Mr. Zarba:

The US Environmental Protection Agency - New England (EPA) has received a Modified Self-Implementing Phase III Remediation Plan ("Phase III Plan") dated January 2015 (received February 10, 2015) to address PCB contamination at the Century Enterprise Center located on Scovill Street in New Milford, Connecticut (the Site). The Phase III Plan was submitted in accordance with the notification requirements under 40 CFR §§ 761.61(a)(3) and (c).

EPA has reviewed the Notification and **has determined that it is incomplete and does not meet the notification requirements at 40 CFR § 761.61(a)(3).** EPA comments follow:

1. EPA was unable to reconcile data presented in the Interim Summary Report ("ISR") with the data provided in the Phase III Plan. For example, Figure 3 of the Phase III Plan shows a PCB concentration of 1.1 ppm for T-3-SB-1-SW-2. EPA also notes that the ISR narrative page 5-5 also indicates a 1.1 ppm PCB concentration at this sample location. However, the ISR Table 5 shows a PCB concentration of ND for this sample location. Please review and ensure all presented data is consistent and accurately reported.

2. Page 2. 2nd to last bullet. EPA's records indicate that the Phase II PCB Remediation Plan was dated December 2006, not December 2004.

3. Page 3. EPA does not understand how the caulks and other building materials were determined to be homogeneous and grouped. Please provide the criteria that was used for this effort. Please also be aware that depending upon the quantity of each type of building material present, three (3) samples may not be sufficient to confirm PCB concentrations. Thus, please also include the quantity (e.g. linear footage, etc.) of each product type present and its location. Please also see Comment 12, below.

4. A table with all sampling results and sorted by material type should be provided. Please also include copies of all analytical reports associated with samples supporting this project. While these data may have previously provided in other reports, the Phase III Plan is a stand-alone plan. Copies of the pertinent analytical reports may be provided on a CD-ROM.

5. Please clarify how the extent of removal (5-foot) at T4-6 was determined. The initial sampling grid was 50 feet. As such, samples may need to be collected directly outside the area of removal, to confirm < 50 ppm for purposes of removal of the surrounding concrete floor areas.

6. Page 5. The sequencing of PCB remediation requires clarification. On this page it appears to indicate that slab areas will first be milled followed by removal of limited sections of the slab. However Figure 3 and Page 9 appear to indicate that sections where slab removal is required will be implemented first, followed by milling of the floor. Please clarify.

7. Page 7. As previously requested, the sequencing of activities is requested. For example, EPA assumes that Item 6 cannot happen prior to Item 9. For Item 14, EPA assumes this activity could not happen unless the slab is removed, and all subslab and foundation PCB impacts are addressed. Please clarify.

8. Please clarify if air monitoring will be conducted during abatement/slab removal. If so, what are the action levels and are these procedures listed in other documents? If air monitoring is not proposed, please clarify why.

9. Page 8. Section 2.4.

    a. Currently, the Phase III Plan indicates that this equipment will be disposed at a non-TSCA permitted landfill. Please clarify the PCB surface concentrations on the cranes to allow disposal in a non-TSCA permitted disposal facility.

    b. It is indicated that in lieu of disposal, decontamination may be implemented in accordance with 40 CFR § 761.61(4)(iii). There is no such citation in the PCB regulations. Please amend for accuracy and clarity.

    c. If decontamination is chosen, please clarify the proposed decontamination standard and how the equipment will be disposed of if the decontamination standard is met. Please also clarify what is meant by the "performance-based method".

10. Page 9. Section 2.5.

    a. 1st paragraph. Please clarify the extent of the area that will be removed to a 2-inch depth and also confirm that the area is associated with the T4-6 sample location.

    b. 1st paragraph. It is indicated that once the less than ("<") 50 ppm PCB standard is achieved, excavated areas will be backfilled and/or re-capped with concrete, as needed. EPA does not understand why this area would be re-capped with concrete if PCB concentrations greater than (">") 1 ppm still remain as the 2nd paragraph indicates that milling will be conducted over the remainder of the floor with the objective of reaching a < 1 ppm PCB cleanup standard.

    c. The overall remedial goal for the concrete floor requires clarification as there is reference to both *low occupancy area* and disposal of concrete slab as construction & demolition ("C&D") waste. Thus, it is not clear what the proposed remedial goal for the concrete floor is. EPA assumes that for soil, the proposed standard is < 1 ppm PCB; however, confirmation is requested.

11. Figures. It is not clear that EPA's copy of the Phase III Plan contained the relevant figures. The figures EPA received were:

    - Figure 2: Areas of Soil and Concrete Excavation and Widespread Floor Confirmatory Sampling Locations (dated May 6, 2004)
    - Figure 2: Underground Utilities (dated February 19, 2003)
    - Figure 3: Proposed Areas for Additional PCB Remediation (January 21, 2015)

    The Phase III Plan Table of Contents indicates the figures should be:

    - Figure 1: Location of Historical Samples and Proposed Post-Milling Floor Slab Samples
    - Figure 2: Floor Drains, Acid Lines and Other Underground Utilities
    - Figure 3: Proposed Areas for Additional PCB Remediation

    Please clarify.

12. It would be helpful if a Waste Table could be provided that provides information on waste management, including area of removal, estimated quantity of waste generated, waste classification and PCB Concentration, and proposed disposal facility.

13. Based on the information presented, it is unclear at this point, how much of the PCB remedial work remaining at this Site can be accomplished under the current available funding. Please provide details on the work outstanding, the estimated cost of the work, and the current funding available. If sufficient funds are not available to complete all PCB remedial work, what is the estimated timeline for work completion?

Should you have any questions regarding the above or questions on the PCB regulations at 40 CFR Part 761, please feel free to call me at (617) 918-1527.

Sincerely,

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
Remediation & Restoration II Branch

cc: G. Trombly, CTDEEP
File

Mike Zarba <mzarba@newmilford.org>

RE: Interim Remedial Action Report

1 message

Tisa, Kimberly <Tisa.Kimberly@epa.gov> Tue, Jul 14, 2015 at 11:28 AM
To: Mike Zarba <mzarba@newmilford.org>
Cc: "Trombly, Gary" <Gary.Trombly@ct.gov>, "Tisa, Kimberly" <Tisa.Kimberly@epa.gov>

Mike:

A few additional comments for consideration. I've tried to go back through the Phase 1 and Phase 2 submittals, but it's time consuming and I need to make sure we're all on the same page for the Phase III.

As you and I discussed, the overall objective for Phase III is to remove all PCBs within the building footprint to achieve a < 1 ppm PCB cleanup standard. You believe the monies that the Town currently have will be sufficient for this. Based on this, any approval issued by EPA will have this as the primary objective with a contingency to leave higher PCB concentrations under a low occupancy area use (see § 761.3 definition) if the < 1 ppm cannot be achieved or if monies are insufficient. Depending upon the PCB concentrations remaining and the uncertainty of when development may occur, if PCBs > 1 ppm remain at the Site following the Phase III work, additional controls may be necessary and the Town will need to record a deed notice to document site conditions.

I know you had indicated that you thought this would address everything, but just to let you know, there are still issues within at least 1 of the outfalls and perhaps the piping outside the building that would remain outstanding, I believe.

Additional Comments:

1. For the T-1 area, following removal of the soil, we need to discuss the verification sampling. Currently, it's 5-foot intervals with compositing. As the delineation is not complete here, I don't believe that compositing is supported, but we can discuss.

2. For the lumber storage area, following removal, it appears that a 50' soil verification sampling frequency is proposed. If so, could you clarify how the composite samples would be collected.

3. Following removal of 1" of the building-wide concrete, composite sampling on a 50-foot center is proposed. The notification indicates that each composite would contain 4 to 5 discrete samples and with an actual level of 0.25 ppm. If the composite contains 5 samples, the action level would be 0.2 ppm, not o.25 ppm.

4. Given the above questions on composite sampling, it would be helpful if one or two examples of the compositing scheme for soils and concrete could be provided for clarification.

5. Please confirm EPA's understanding of waste disposal as follows:

- T4-6 concrete slab will be removed/disposed as a >/= 50 ppm PCB waste
- T1 soils (SB-7A and SB-9A areas) will be removed/disposed as a >/= 50 ppm PCB waste
- Building-wide milled concrete will be removed/disposed as a < 50 ppm PCB waste
- Drain lines, associated piping and residual will be removed/disposed as a >/= 50 ppm PCB waste
- Acid lines and overlying concrete will be removed/disposed as a < 50 ppm PCB waste
- Soil at E4-B14 to be removed/disposed as a < 50 ppm PCB waste
- Soils exterior to the electrical room will be removed/disposed as a < 50 ppm PCB waste
- Concrete foundation exterior to the electrical room to be removed/disposed as a < 50 ppm PCB waste
- Concrete slab removed in the lumber storage area to be disposed as a < 50 ppm PCB waste

6. The notification indicates that the overhead cranes had PCBs at > 10 µg/100 cm2 and would be disposed in a non-TSCA facility and may be decontaminated. What are the PCB concentrations on the cranes? Are the PCBs in the paint rather than in dust?

7. Clarification on removal/disposal of concrete at B38 and B39 locations is requested

8. The notification indicates that the < 50 ppm PCB caulk/glazing is a CT-regulated waste and that it will be removed prior to building demolition. Please clarify where this waste will be disposed of.

9. Just a note for your consideration, for the steel beams, etc, and for recycling, do we need to be concerned about contamination from dust, etc?

Thanks for your patience on this, but EPA needs to be clear on what is being done for this phase of work.

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)

USEPA

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From: Tisa, Kimberly
Sent: Monday, July 13, 2015 4:58 PM
To: 'Mike Zarba'
Cc: 'Trombly, Gary'; Tisa, Kimberly
Subject: RE: Interim Remdial Action Report

Mike:

I have gone back through the Tighe & Bond report, your proposed plan and the responses to EPA's comments. I am still a little confused on exactly what is being done and why. As TRC put this together it may help us to have a discussion with them. In the meantime, I provide the following as points of discussion.

1. TRC Figure 3. For the T-1 area there is reference to T-1-SB-9(A) and the T&B IRAR. On Figure 5-1 of the IRAR, there is no sample location indicated as T-1-SB-9(A), but rather T-1-SB-8(A) within the SB-9 grid. EPA assumes that there is a typo in the IRAR and that the sample should be T-1-SB-9(A) within the SB-9 grid.

2. TRC Figure 3. For the Electrical Room (shown as Inset A), in the T&B IRAR, sample location E1 OB SW9 appeared to show a PCB concentration of 1.9 ppm and is also shown in Table 6-1 of the IRAR. However, it is not shown on the TRC Figure 3 as a sampling location with > 1 ppm. What is shown on Figure 3 is E1-OB-SW6 with a PCB concentration of 1.44 ppm. On page 5-6 of the IRAR, Section 5.4.1, 2nd paragraph, it indicates that additional soil removal occurred in this area and that the February 12, 2008 results were ND for PCBs.

3. Please clarify the reason for the soil excavation proposed at sample location E4-B14. Table 6-4 of the IRAR indicates that the soil sample was 0.55 ppm and thus < 1 ppm.

4. For the Lumber Storage and Box Shop, there is reference to Figure 2 for sub-slab sampling locations. EPA was unable to find these sample locations on Figure 2. Please clarify.

5. For sample location B-38, it is indicated that delineation samples will be collected from the bottom of slab at each grid corner point and from the subslab soil. There is also reference to additional delineation on a 10-foot grid. The same work will also be conducted at B-39. Please clarify why both are post-milling delineation samples and how each set of data will be used.

My apologies for continued questions, but it is very difficult to follow all the nuances as presented and I need to make sure both EPA and CTDEEP understand what is to be conducted under Phase III.

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)

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From: Mike Zarba [mailto:mzarba@newmilford.org]
Sent: Friday, June 12, 2015 8:18 AM
To: Tisa, Kimberly
Cc: Trombly, Gary; Doubleday, Edward
Subject: Fwd: Interim Remdial Action Report

Good Morning Kim:

Please find attached the reply and revised IRAR pages from Jim Olsen at Tighe & Bond in reference to comment # 1 of your April 2, 2015 review. This confirms your original finding that this sample location was inconsistent in the original report. Please replace the two pages with the revised updated pages attached hereto.

I believe this was the last bit of information you were looking for in reference to your original review, however if you need any additional information please do not hesitate to contact me.

Again, thank you for your time and attention in reviewing this project. Take Care,

Michael F. Zarba, P.E.

Public Works Director

Town of New Milford

(860) 355-6040 phone

(860) 355-6055 fax

www.newmilford.org

-------- Forwarded message --------
From: **James T. Olsen** <JTOlsen@tighebond.com>
Date: Thu, Jun 11, 2015 at 7:10 PM
Subject: RE: Interim Remdial Action Report
To: Mike Zarba <mzarba@newmilford.org>

Hi Mike,

Sorry for delay on this. You are correct and that is a mistake. Attached are the revised pages.

Please let me know if you need anything else.

Jim

From: Mike Zarba [mailto:mzarba@newmilford.org]
Sent: Tuesday, April 21, 2015 1:56 PM
To: James T. Olsen
Subject: Interim Remdial Action Report

Jim:

As we discussed can you please confirm that the appropriate information is contained in the IRAR and/or update the appropriate information as follows?

EPA had commented about an inconsistency of data presented in that report. Specifically regarding a test sample (T-3-SB-1-SW-2) which is referenced on page 5-5 of your narrative as T-3-SB-1-SW-3 - I believe that should reference T-3-SB-1-SW-**2**. The narrative states that this sample exceeded the 1.0 mg/Kg limit at 1.1 mg/Kg, however the corresponding table (Table 5-3) shows a ND for this sample.

I included scans of the three pages and have highlighted the areas that I believe need confirmation and/or updating. Again can you please check this information and issue the appropriate changes, if necessary.

Please let me know if you have any questions.

Thank You,

Michael F. Zarba, P.E.

Public Works Director

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The following plan is intended to serve as Notification to the U.S. Environmental Protection Agency (EPA) Regional Administrator, the Commissioner of the CT Department of Environmental of Environmental Protection (CTDEP), as required under 40 CFR 261.61(a)(3), of planned self-implementing on-site cleanup and disposal of PCB remediation waste at the Century Enterprise Center (CEC) located on Aspetuck Ridge Road in New Milford, Connecticut (EPA ID CTD000847707).

In accordance with the requirements of the Notification, this plan includes the following information:

- The nature of the contamination including kinds of materials contaminated;
- A summary of the procedures used to sample contaminated and adjacent areas and tables and maps showing PCB concentrations measured in all pre-cleanup characterization samples;
- The location and extent of the identified contaminated areas, including maps with sample collection sites cross referenced to the sample identification numbers in the data summary tables;
- A cleanup plan for the site, including schedule, disposal technology, and approach;
- Contingencies and options to be used if unanticipated higher concentrations or wider distributions of PCB remediation waste are found or other obstacles force changes in the cleanup approach; and
- A written certification (cover letter), signed by the owner of the property and party conducting the cleanup (both Town of New Milford) that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to access or characterize the PCB contamination at the site, are on file at the location listed below and are available for EPA inspection.

File Location

Community Planning & Economic Development Office
Town Hall
10 Main Street
New Milford
Contact: Valerie Wilson
Phone:(860) 355-6081

Specifically, the Notification within this report is for the cleanup of Bulk PCB Remediation Waste inside and underneath the 320,000 ft^2PCB building at the site. This cleanup is designated as the "Phase I PCB Source Removal" for the project.

Bulk PCB Remediation Waste that will be cleaned up in this phase includes concrete and soil under former leaking transformers located inside the building and porous materials (e.g. paper, wood, debris) inside the building. Asbestos abatement and removal of other hazardous materials (e.g. drums, containers, and batteries) will also be conducted during this remediation phase but the specific procedures are not included in this plan.

Remediation of PCB-contaminated asphalt, concrete, and soil at the building entryways is not included in this plan. Also, widespread PCB contamination in the upper 1 inch of the building slab and decontamination of non-porous surfaces is not included in this plan. The Town has limited funding for the cleanup and remediation of these areas will be performed at a later date under Phase II when the Town has secured additional funding and/or a developer has acquired the site.

2.1 LOCATION

The CEC site is located along Aspetuck Ridge Road in New Milford, Connecticut (Figure 1). The site is accessed by a private street, Scovill Street, which begins at Aspetuck Ridge Road. (A former address of the facility was 12 Scovill Street.) The property consists of approximately 72 acres bordered on the north by the West Aspetuck River, south by Housatonic Avenue (a.k.a. Boardman Road), east by Aspetuck Ridge Road and several residential properties, and west by two residential properties along Sostak Road and undeveloped hillside.

Historically, the CEC has been referred to by other names including the "Century Brass Facility", "Century Brass Tube Mill", or "Davko Site".

The neighborhood is a mixed residential/industrial-zoned area (Zones R40 & I) of New Milford. According to the Town of New Milford Tax Assessor's files, the site is identified on Map 34/Blocks 40 and 41, and Map 35/Blocks 2, 4 and 5. The current owner of the property is the Town of New Milford.

Topography at the site is relatively flat at elevations between 220 and 230 feet above mean sea level (Figure 2). Along the western property line is a steep hillside, and along the northern and eastern property lines are relatively steep embankments along the banks of the West Aspetuck River.

The site is bisected by an east-west oriented topographic drainage divide. Surface water run-off to the north of the divide flows to the West Aspetuck River, and to the south of the divide to the Housatonic River.

2.2 FACILITY BACKGROUND

Prior to 1957, the site was used primarily as agricultural land. Beginning in 1957, the site was developed as a manufacturing facility that included landscaped areas, remnant vacant land, asphalt paved parking areas, a guard house, a pumping station, a former wastewater treatment plant (WWTP) and clarifier, a former equalization lagoon, former metal hydroxide sludge lagoons, and a one-story manufacturing building Tube Mill.

Construction of the buildings and other on-site improvements occurred in 1957 by the Scovill Manufacturing Company. The facility was used to manufacture copper and brass alloy tubing by Scovill Manufacturing Company from 1957 to 1976, and then by Century Brass Products, Inc., from 1976 to 1985. In 1985, the New Milford Century Brass Products facility filed for Chapter 11 bankruptcy and was forced to terminate plant operations. During the years 1985 to 1988, operations were limited to plant shutdown procedures.

From 1988 to 1999, the facility was owned and used by Davko, Inc., as a storage warehouse for boats and pre-manufactured goods. Since 1999, the facility has remained abandoned.

The Tube Mill building is constructed of brick, concrete block, and aluminum walls and corrugated aluminum ceilings on a concrete slab foundation. The building is approximately three stories in height (40 feet) and covers approximately 320,000 square feet. The Tube Mill building is separated into several distinct areas including a former manufacturing area (approximately 300,000 square feet), general office space, a hospital area, a laboratory, a locker room, a machine shop, a transformer room, and a boiler room.

Access to the site is controlled by a gate at the entrance to Scovill Street. In addition, access to the building is restricted to one door due to environment risks posed by a PCB release and uncontained asbestos containing materials within the building interior.

Most of the equipment used in the former manufacturing activities has been removed from the building. The former office area was used to store personal and household items as the former owner (Davko), rented space to persons for storage of various goods. Some of these goods are still present at the facility. Miscellaneous machining equipment and a large self-propel crane are present within the former manufacturing area.

The manufacturing area has a number of former sub-slab pits and trenches. The former pits and trenches include four former pickling pits and shallow trenches for which the locations correspond to locations of draw-benches and furnaces on old facility drawings and likely are the foundations for this equipment. The shallow pits and trenches are currently filled with sand flush with the finished floor elevation; reportedly, the pits were cleaned prior to being filled with sand in 1988. The four pickling pit areas have been filled with sand and covered with a concrete slab at the level of the finished floor.

Some of the chemicals which posed a threat to human health or the environment have been removed from the site during past cleanups. The chemicals that remain include several containers of waste oil, roof cement, anti-freeze, lacquer thinner, hydraulic fluid, torque fluid, kerosene, lubricating oil, NB-11, ND-22, 7D-24 fuel oil conditioner, and terressic 68. The Phase I Environmental Site Assessment (ESA) summarizes approximate number and size of containers. Since the Phase I ESA was completed, mercury in the electrical equipment has been removed.

2.3 STORAGE TANKS

Various above ground and underground storage tanks were used at the site when manufacturing activities occurred at the facility. The above ground storage tanks include former propane tanks, former sulfuric acid tanks, former tanks to store chemicals in the Wastewater Treatment Plant (WWTP), a clarifier and a 275-gallon storage tank in the machine shop. The underground storage tanks include the 1,000-gallon tank used to store gasoline, two 30,000-gallon storage tanks used to store #6 heating oil, and a 10,000-gallon tank used to store process water supply.

The above ground tanks that remain on-site have been cleaned and removed from the site. The underground storage tanks have also been removed from the site.

2.4 FORMER MANUFACTURING OPERATIONS

The former manufacturing processes at the site included drawing, rolling and annealing of brass wire and tubing. Between drawing processes, the material was cleaned in an acid pickling solution. Following annealing, the tubing was generally cleaned in a sulfuric acid solution. Occasionally, heavily oxidized tubing was cleaned with a dichromate/sulfur acid solution. Reportedly, a small percentage of the tubing was also finished with an anti-tarnish coating by dipping the tubing in a concentrated coating solution in a process tank.

Of the above solutions, only spent sulfuric acid solution was treated by the on-site WWTP (reportedly 300,000 gallons per day; see discussion below). The spent dichromate/sulfuric acid solution (approximately 3,500 gallons every two years) and spent anti-tarnish coating solution (approximately 1,500 gallons per year) were disposed of off-site.

The facility contained a small laboratory in which the manufactured tubing was tested for imperfections. The waste stream from the laboratory operations consisted of spent mercuric nitrate solution. The spent mercuric nitrate solutions (5 gallons per 3 months) were reportedly disposed of off-site.

Mineral spirits were used for maintenance and degreasing operations. The degreasing operations were performed primarily in a 20-gallon dip tank; however, mineral spirits were also dripped on tubing during the drawing operations to provide lubrication. The spent mineral spirits (300 gallons per year) either evaporated or disposed of off-site.

Soap was used as a lubricant during the rolling process. Two above ground tanks located in the building interior were used to store soap.

Process industrial water was obtained through a diversion of surface water from the Housatonic River. The water was diverted by means of the pump house, which is

located south of the facility. The diversion has a maximum registered withdrawal of 6.5 million gallons per day.

Four pickling pits were located in the building interior. These pits confined steel dip tanks which were subsequently removed when equipment was salvaged from the facility. Based on the manufacturing activities, two of the pickling pits likely contained sulfuric acid pickling solution, one pit contained the dichromate/sulfuric acid solution, and one pit contained the concentrated anti-tarnish solution. As discussed in Section 2.2, the pickling pits have been filled with sand and covered with cement.

2.5 HAZARDOUS WASTE STREAMS

Based on information in the Part A Permit Application, three waste streams were generated at the facility. The waste streams include metal hydroxide sludge (EPA hazardous waste codes D005 (barium), D007 (chromium) and D008 (lead), spent mercuric nitrate (EPA Hazardous Waste Code U151) and spent mineral spirits (EPA Hazardous Waste Code D001). The metal hydroxide sludge generated at the WWTP was determined to be characteristically hazardous by EP Toxicity methodology.

The Part A Permit Application indicates two process areas for hazardous waste. One area is the former sludge lagoons and the other is two container storage areas (CSAs) within the building interior.

2.6 UNDERGROUND UTILITIES

Initial sampling of sediment in several on-site manholes/drains has identified contaminants above regulatory threshold levels. A plan depicting the underground utility systems is shown on Figure 3. The locations of the on-site underground utilities shown on Figure 3 were derived from the historic facility drawings. Based on revision dates on those historical drawings, they appear to be both proposed and as-built drawings. However, several discrepancies are noted in the old drawings and existing conditions. The apparent discrepancies between the drawings and existing features are discussed in this section.

Three distinct undergroundwater supply systems are found at the facility. The systems include:

(1) potable water system;

(2) industrial process water system; and

(3) fire protection system.

The source of the potable water system was the municipal water system located along Housatonic Avenue. This water was likely used for drinking water supplies at the facility. The volume of water used from the municipal system has not been investigated.

The source of water for the industrial process water system was the diversion of surface water from the Housatonic River. The water was pumped from the pump station located across Housatonic Avenue to the boiler room and an underground 10,000-gallon storage tank. The registered maximum withdrawal of the diverted waster is 6.5 million gallons per day. This water was used for the industrial process and cooling water.

On the old drawings, piping was shown to extend from the underground storage tank to a "well" located in the field northwest of the building. This piping is interpreted as an overflow line based on reported invert elevations along the piping. The invert elevations allowed for gravity drainage to the well. Therefore, the well was likely a proposed injection well. The old facility plans also depict overflow piping from the "well" to the drainage channel west of monitoring well GZ-7 and leading to the West Aspetuck River.

Neither the injection well nor an outfall west of GZ-7 was observed during site surveys. It is believed that the system was likely modified during construction. The modifications likely included the elimination of the "injection well" and relocation of the outfall. It is believed that the current outfall SWO-2 is the result of these modifications.

Source of the water for the fire protection system was a connection to the potable water supply system near the southeastern corner of the building. Water was pumped from the potable water supply system to a storage tank located on the hillside to the west of the site. Apparently, the storage tank provided the requisite quantities and pressures for fire flows during an emergency condition.

Three underground wastewater systems existed at the facility. The systems are characterized as a sanitary sewer line, an on-site process wastewater system, and two storm water discharge lines. The sanitary line was used to convey sanitary wastewater from the offices and latrines to the municipal sewer system. The volume of water discharged to the sanitary system has not been investigated.

The on-site process wastewater system was used to convey acid solutions and process rinse waters from the pickling pits to the Wastewater Treatment Plant (WWTP) for on-site treatment. The treatment process at the WWTP is described in the next section. The volume of wastewater that could be conveyed along this system is reportedly 307,000 gallons per day (based on NPDES data).

The on-site process wastewater system shown on Figure 3 includes two emergency overflow lines. The lines are interpreted as emergency overflow by Tighe & Bond during this investigation. First, the old facility drawings only depict a partial line at two separate locations with a note stating "to well". Given the orientation of the lines, their intersection would have been the location of the former sludge lagoons. Based on the facility's construction date, circa 1957, it is believed that this well was never installed and instead the sludge lagoons were constructed to handle the high volume of sludge to be generated.

Second, the reported invert elevations for the process wastewater system indicate gravity drainage to the equalization lagoon. The overflow lines were located at the ends of the system at its highest elevation with the invert elevations of the overflow lines above the invert elevations for the main system. Therefore, either water was pumped from the well to the acid line for flushing but this is unlikely. It is believe that the lines were used for emergency overflow in case the acid line became plugged.

It should be noted that the southeastern overflow line was not discovered during the former sludge lagoon closure activities. Therefore, it is believed that this line was never constructed.

Two storm water lines exist at the site and discharge to either of two identified outfalls, SWO-2 in the West Aspetuck River or SWO-3 in the Housatonic River. The system that discharges to outfall SWO-2 is connected to the roof drains located on the western portions of the facility and an interior drain located near AOC-8, the dip tank. The system that discharges to SWO-3 was connected to the roof drains located on the eastern portions of the facility, cooling water discharge, and treated industrial wastewater discharge from the WWTP. Locations of SWO-2 and SWO- 3 are shown on Figure 3.

Give an annual precipitation of approximately 4 feet per year and the footprint of the facility, the estimated combined stormwater discharge to outfalls SWO-2 and SWO-3 is estimated at 26,000 gallons pre day. The volume of cooling water discharged to outfall SWO-3 was reported at 2.28 million gallons per day. The volume of treated wastewater was reported at 307,000 gallons per day.

2.7 WASTEWATER TREATMENT PLANT

Based on historical site plans and other documentation, from 1958 to 1985, process rinse waters, waste sulfuric acid pickling solutions and anti-tarnishing compound rinse waters were treated at the on-site Wastewater Treatment Plant (WWTP).

Effluent generated from the treatment process was discharged to the Housatonic River. Metal hydroxide sludge, which was generated during the treatment process, was piped to two unlined regulated sludge lagoons located on the eastern section of the property.

Briefly, the treatment process consisted of the following: untreated rinse waters and acid solutions were drained to the equalization lagoon; from the equalization lagoon, the solutions were pumped to the WWTP at which point lime was added to increase the pH of the solution.

From the WWTP, the pH adjusted solution was pumped to the clarifier at which point a flocculating agent was added to precipitate heavy metal constituents from the solution; the treated wastewater solution was discharged to the Housatonic River (SWO-3), and heavy metal precipitate (sludge) was pumped to the lagoons.

Deposition of sludge within the two former regulated sludge lagoons was terminated in April 1984. Based on the Part A Permit Application, the generation of sludge was estimated at 50 cubic yards per year. Based on the closure activities, approximately 8,000 cubic yards were removed from the former lagoon areas. Given the years of operation, 1958 to 1984, the volume of sludge generated at the facility would have been approximately 300 cubic yards per year.

2.8 PERMITS/ENFORCEMENT ACTIONS

The facility (Scovill Manufacturing and Century Brass Products) had a NPDES discharge permit (CT000390). This permit allowed for the discharge of wastewater of up to 2.9 million gallons per day (MGD) to the Housatonic River (SWO-3). The discharge includes cooling water (2.28 MGD), treated wastewater (307,000 gallons per day (GPD)), and screening backwash (50 gallons per minute (GPM)). Based on available records, this permit dates back to 1974. It is likely that similar discharges were occurring back to the construction of the WWTP in 1958. The permit was developed in response to passage of amendments to the Clean Water Act in 1972.

In 1990, Davko received a discharge permit (SP0001337) for the discharge of filtrate from the dewatering of metal hydroxide sludge during closure activities. The discharge was to the Town of New Milford Sewage Treatment Plant through the sanitary sewer system. The maximum permitted flow was 120,000 gallons per day.

On February 18, 1983, Century Brass Products submitted a Part A Permit Notification as an interim-status treatment, storage and disposal (TSD) facility. Century Brass Products indicated three waste streams (see Section 2.5).

In 1992, Davco submitted a Part B Permit Application which summarized the closure plan, waste disposal activities and proposed post-closure monitoring activities.

On March 16, 1988, Century Brass Products filed an Underground Storage Tank (UST) Notification. The notification lists two 30,000-gallon USTs used to store #6 heating oil and one 1000-gallon UST used to store gasoline. The tanks were reportedly installed in April 1957 and last used in November 1985. The gasoline UST was listed as abandoned in place, and both USTs storing No. 6 fuel oil were temporarily abandoned with approximately 3,300 gallons of product remaining in the tanks.

Orders issued to previous owners of the facility consist of the following:

Order #	Date	Agency	Entity	Status
O HM-25	11/82	CTDEP	CBP	Revoked 9/88
O HM-218	10/84	CTDEP	CBP	1/86
CO HM-445	9/87	CTDEP	CBP	Revoked 9/88
CO HM-533	9/88	CTDEP	Davko	
O HM-827	1/98	CTDEP	Davko	

2.9 OTHER ACTIVITIES AFFECTING THE ENVIRONMENT

Sludge was reportedly deposited in an area northwest of the Tube Mill building during a period of approximately eight years (1961 to 1969). This activity was unregulated.

In 1983, the liner on the equalization lagoon was replaced. Apparently, the liner did not exhibit characteristics of hazardous waste and was disposed of off-site as non-hazardous waste.

Two areas of stressed vegetation have been noted at the site. At least one area, the northwest area, was noted in the 1988 GZA Environmental Site Assessment (ESA).

A pumping station is located south of the Tube Mill building across Housatonic Avenue. The pumping station was used to transfer up to 6.5 million gallons of water per day from the Housatonic River to the facility for industrial purposes.

In 1999, the Connecticut Department of Environmental Protection became aware that the transformers within the building interior had been leaking. CTDEP took samples and performed removal actions. Five transformers were removed from the facility by CTDEP.

Evidence of former engine repairs that likely occurred during ownership by Davko could be observed at limited areas with the building interior during the Phase I ESA. The areas were in the central western addition to the main building. The engines consisted of marine outboard motors.

The roof has numerous leaks. The leaks are reported in the CTDEP notes on the PCB cleanup in 1999. Precipitation leaking through the roof is ponding on the slab. This water either evaporates or infiltrates through the slab.

2.10 GROUNDWATER AND SURFACE WATER CLASSIFICATIONS

Groundwater beneath the site is classified as GB by the CTDEP. Groundwater with a GB Classification designates highly urbanized areas or areas of intense industrial activity and where public water supply is available. This water may not be suitable for direct human consumption due to waste discharges, chemical spills or leaks, or land-use impacts. CTDEP's goal is to prevent further degradation of water quality by preventing additional discharges that would cause irreversible contamination.

An east-west oriented groundwater divide exists adjacent to the former metal hydroxide lagoons. Groundwater south of the lagoons flows south-southeast towards the Housatonic River whereas groundwater north of the lagoon flows north-northeast towards the West Aspetuck River.

Groundwater surrounding the site is classified as GA by the CTDEP. Groundwater with a GA Classification designates areas of influence of private and potential public wells. This water is presumed suitable for direct human consumption without the need for treatment. CTDEP's goal is to maintain the drinking water quality standards.

The Housatonic River, located approximately 1,000 feet south of the site, is classified as D/B by the CTDEP. Class D/B surface waters are known to presently not meet Water Quality Criteria or not support one or more assigned designated uses due to severe pollution. The goal for such waters may be Class A or Class B.

The West Aspetuck River abutting the site to the north has an A Classification by the CTDEP. Class A surface waters are known or presumed to meet Water Quality Criteria, which support designated uses.

2.11 NEARBY PRIVATE AND PUBLIC WATER SUPPLY WELLS

On December 12 and 13, 2000, Marin Environmental conducted a receptor survey on properties located within a one-half mile of the facility. This survey was updated in March 2003 during preparation of the RCRA Facility Investigation (RFI). The survey included a review of documents at the New Milford Health Department and a list of consumers with the United Water Connecticut (UWCT), and a field survey of properties within the study area.

Streets in the study area not serviced by UWCT include Fort Hill Road (2 residences), Jewell Place (1 residence), Candlewood Lake Road North (5 residences), Schaghticoke Trail (6 residences), and Sostak Road (2 residences).

The number of residences listed above (total of 16) was determined from the field survey. It is assumed that the above residences are served by a private well or small community water supply well.

During the field survey, 14 properties were identified that are not on the UWCT list within the study area. It is assumed that these properties have their own water supply well. The addresses of the properties are as follows:

- 35 Aspetuck Ridge Road;
- 110 & 120 Housatonic Road;
- 48, 91, 95, 102 & 108 Kent Road;
- 3 & 4 Riverview Court
- 20, 22 & 26 Wells Road; and
- Watkins Brothers Machinery on Wells Road.

(Note that the residence at 8 Aspetuck Ridge Road did not exist during the recent inquiries and has been removed from the original listing in the 2000 Phase III ESA.)

Review of the files at the New Milford Health Department included information on two wells, a private well at 22 Candlewood Lake Road and a community well at Schaghticoke Trail that served six residences.

During the field survey, wellheads were observed at three properties, 6 Schaghticoke Trail, 14 Schaghticoke Trail and the property at the corner of Sostak and Housatonic Avenue.

Based on a review of the "Atlas of Public Water Supply Sources & Drainage Basins" (CTDEP, 1982), one community water supply source is located within one- half mile of the site. The community well is listed as the "River View Court Association". The well is located directly across the Housatonic River from site.

According to Town of New Milford personnel, one public water supply well (non-community system) was being installed adjacent to the Temple Sholom located at 122 Kent Road approximately 1,500 feet southeast of the site on the opposite side of the Housatonic River during the RFI. According to the Town's Assessors records, a well exists at 5 Aspetuck Road.

The municipal water supply service area is assigned to United Water Connecticut (UWCT). United Water Connecticut has two well fields located across the Housatonic River. The closest well field is the Indian Field Well Field, which has three wells. The other well field is the Fort Hill Road Well Field, which is also located approximately one-mile from the site.

2.12 CURRENT STATUS

The current status of the CEC is a high-priority RCRA corrective action site as designated by the EPA. This status is based on the current environmental indicator determinations.

The facility has undergone closure by removal of hazardous waste at the regulated units. Closure of the regulated units will be complete after the final cap is installed. The facility is currently in the first year of post-closure groundwater monitoring.

The facility is an establishment as defined by Connecticut Regulations and has entered into the Voluntary Remediation Program. The State of Connecticut has determined that the remediation can be overseen by a License Environmental Professional (LEP).

Recent revisions to the State of Connecticut Hazardous Waste Regulations are applicable to the CEC site. The revisions effectively allow remediation to be performed at former land disposal facilities in Connecticut with ultimate termination of the interim status by the CTDEP Commissioner. Connecticut was recently authorized by the EPA to lead the RCRA Corrective Action Program for land disposal facilities (LDFs).

Currently, Tighe & Bond is conducting RCRA Post-Closure Groundwater Monitoring at the site. Except for installation of the final cap, closure of the former sludge lagoons was completed during 2002 and the post-closure monitoring began in January 2003.

2.12.1 Interim Measures

Various interim measures have been performed at the site. The interim measures include:

Removal of the Transformers

In May 1999, CTDEP identified that the on-site transformers had dielectric fluid that contained PCBs and were leaking. Five transformers were removed from the building interior under supervision of CTDEP personnel. Widespread PCB contamination was identified within the building interior.

Removal of Mercury in the Rectifier

In May 2002, a subcontractor for EPA performed a Removal Site Evaluation. The major hazardous substances identified in the evaluation were corrosive liquids in a drum, liquid mercury in electrical components and friable asbestos-containing-material (ACM).

On May 22, 2002, the Town of New Milford contracted with Clean Harbors of Bristol, Connecticut to remove the liquid mercury. The corrosive liquids and ACM remain on-site.

Restricting Access to Building

Since the Town acquired ownership of the property, access to the site and specifically building has been strictly controlled. The police question any persons on the property. All but one door to the facility are welded shut; the one door is locked 24 hours per day. The windows are boarded and secured. The facility is routinely inspected by the New Milford Public Works Department and repairs performed as necessary.

Inside the building, the concern is exposures to PCB and asbestos-containing-material by trespassers. In August 2002 and July 2004, Tighe & Bond performed ambient air sampling to determine potential exposure. Results of the air sampling indicate that the measured concentrations for asbestos, lead and PCBs did not warrant routine use of respirators. However, the report recommends the use of half-face respirators should work be done on the interior that could disturb such material.

Building Entry Procedures

Limited visits to the building interior are conducted under the supervision of the Town or Tighe & Bond for a variety of reasons as detailed below. The procedures assume that the visitors entering the building may not possess the health and safety training as specified under 29 CFR 1910.120.

Description of Visits: The visits are conducted for a variety of purposes including, but not limited to, showing the building interior to potential developers who are interested in acquiring the site for redevelopment, conducting pre-bid meetings for contractors who are interested in bidding on remediation work, and periodic inspections by Town to evaluate the condition and safety of the structure. Visitors are informed of the contaminant issues in the building including a brief discussion of what areas are "off-limits". These visits are usually an hour or less in duration.

Personal Protective Equipment (PPE): Visitors are required to wear disposable safety boots. A case of boots is kept in the former guardhouse which is a separate, structure that has been recently refurbished and secured by the Town. Dust masks are also available in the guardhouse. Waste PPE is kept in a drum inside of the main building

entrance. This waste PPE will be disposed of in accordance with 40 CFR 261 during future remediation activities.

Restricted Areas: The electrical room and boiler room are off limits to visitors. These areas are controlled with safety tape and signage. The former transformer areas in the building areas are isolated with cones and safety tape.

Record Keeping: A sign in/out form is maintained by the Town. All visitors are required to sign the forms and indicate the date of their visit including entry and exit times.

2.12.2 Closure of Regulated Units

Closure of the regulated units has been occurring since 1987. The closure activities that have been performed include removal of sludge and impacted soils in the former lagoon footprint and feedline, and decontamination of equipment within the WWTP.

The closure activities that have not been completed include final grading of the cap on the former lagoons, decontamination of the container storage areas within the building interior and post-closure groundwater monitoring.

2.12.3 Environmental Indicators

On March 22, 2000, Tetra Tech EM, Inc., provided a review of the environmental indicator determinations for the property.

The conclusion of Tetra Tech was that the human exposure EI determination was IN (inconclusive) and the migration of contaminated groundwater EI determination was NO (not under control). No backup documentation was provided for this determination.

Based on EPA's guideline for an EI evaluation, a "NO" determination for the migration of contaminated groundwater EI can be made for one of three conditions. The conditions are:

(1) Groundwater contamination extends beyond the monitoring network;

(2) Discharge to surface water is either not insignificant or not within acceptable levels; and,

(3) No future monitoring.

The NO determination by Tetra Tech was likely based on Condition (1) as the evaluation (a) acknowledged the planned future monitoring, (b) did not mention surface water impacts, and (c) did indicate that the last round of sampling (in 1994) was limited

to a few wells surrounding the lagoons with poor documentation of the groundwater quality. The evaluation further states that because the sludge had been removed, it was anticipated that the quality has not degraded further. In addition, groundwater may be impacted due to the PCB release and that groundwater in the lower regime should be evaluated at more than one well.

One purpose of the RFI was to provide data upon which environmental indicators can be determined. The CTDEP is currently evaluating the EI determinations for the site using the RFI data.

2.13 AREAS OF CONCERN

Based on the previous investigations, regulatory review and site history, 23 Areas of Concern (AOCs) have been identified at the site.

The locations of the AOCs are shown on Figure 2. Detailed descriptions of the AOCs are provided below:

AOC-1 - 1,000-gallon Gasoline UST: According to a Connecticut Department of Environmental Protection (CTDEP) Underground Storage Facility Notification dated March 1988 and an Underground Petroleum Storage Facilities Questionnaire dated October 1988, one steel 1,000-gallon gasoline UST was located at the site. According to the notification, this tank was installed in April 1957 and that the tank was abandoned in place in February 1988. GZA Environmental Site Assessment dated December 1988, states that the tank was removed from the site in December 1987 or January 1988 by DJP Associates, Ltd. of Waterbury, Connecticut. During the Marin Phase I ESA, an area containing the gasoline UST was inspected. Evidence of removal was not observed. In fact, the tank access hole, fill and vent pipes, and gasoline pump were observed in this area. The tank contents were inspected the tank for the presence of remaining product. Approximately 804 gallons of water was observed within the UST.

During the Phase III ESA, three soil samples were collected from the perimeter of the tank. No signs of contamination were visual observed in the field or documented by the analytical data.

The UST has been removed during remediation activities conducted by the Town in 2004.

AOC-2 - Regulated Former Sludge Lagoons: The former sludge lagoons have been undergoing clean closure by a CTDEP-approved closure plan. Based on the sampling collected during the closure activities, the contaminants of concern were metals including copper, nickel and zinc. VOCs are not a concern with the sludge.

Reportedly, all sludge and impacted soils have been removed. Representative post-remediation confirmatory samples indicate achievement of the closure criteria (GZA, 2001). The area is currently being re-graded for installation of the final capping by the Town of New Milford under consultation with CTDEP.

AOC-3 - Two 30,000-gallon No. 6 Heating Oil USTs: According to a Connecticut Department of Environmental Protection (CTDEP) Underground Storage Facility Notification dated March 1988, two steel 30,000-gallon No. 6 heating oil USTs were located at the site. These tanks were installed in 1957.

During the Marin Phase I site inspection, an area containing the two No. 6 heating oil USTs was observed adjacent to the east of the Tube Mill building. Fill pipes for each tank were observed within a steel containment. Heavy staining, including free product, was observed adjacent to the fill pipes within the steel containment. Vent pipes were observed adjacent to the eastern section of the Tube Mill building. In addition, Marin inspected the tanks for the presence of product in each of the USTs. An estimated 14,000 gallons of No. 6 fuel oil was present within the southern UST. Approximately 660 gallons of No. 6 fuel oil and approximately 1,400 gallons of water were present within the northern UST.

During the Phase III ESA several soil samples were collected around the USTs and fill pipe. Contamination (ETPH) was detected at one boring adjacent to the fill pipe to a depth of approximately 14 feet. The horizontal extent of contamination appeared to be limited. The contamination is consistent with No. 6 fuel oil.

These USTs have been removed and impacted soils remediated during remediation activities conducted by the Town in 2004.

AOC-4 - Wastewater Treatment Plant and Clarifier: The former Wastewater Treatment Plant (WWTP) and clarifier were located adjacent to the east of the Tube Mill building. From approximately 1957 to 1985, the on-site WWTP treated acidic rinse waters generated from manufacturing processes. The WWTP system included a lined equalization lagoon (AOC 5), a clarifier tank, and a treatment building containing plant controls, two neutralization tanks and raw material storage tanks.

Prior to treatment, rinse waters and acid solutions were contained within the equalization lagoon. From the lagoon, the water was then pumped to the treatment plant and then to the clarifier where heavy metal constituents were precipitated out of the solution by the addition of a flocculent. The clarified liquid was then discharged to the Housatonic River under an NPDES Permit. Metal hydroxide sludge which settled at the bottom of the clarifier was then piped to the two on-site regulated metal hydroxide sludge lagoons.

Reportedly, the WWTP system was recently decontaminated during the former lagoons closure activities. Four floor drains were observed within the treatment plant. These floor drains likely discharge to the facility's storm water drainage system and eventually to the Housatonic River.

According to a Facility Plan of the Scovill Manufacturing Company entitled Outside Piping, East Side of Mill, dated July 1958, one dichromate aboveground storage tank (AST) was formerly located adjacent to the southeast of the WWTP to the east of the Tube Mill building. Currently, this tank is not present.

This area was examined during the Marin Phase I inspection. No evidence of staining or past releases was observed in this area.

During the Phase III ESA, several borings were performed in the exterior areas. No contamination was evident at those borings. Borings of the subsurface under the WWTP could not be performed as was planned for the Phase III ESA due to the thickness of the concrete.

During the RFI, two borings were installed inside the WWTP utilizing heavier duty equipment. Results of this investigation indicated the presence of metals (copper, nickel, and zinc) impacted soil above regulatory criteria. The Town has decided to leave the soils in place under the building as Environmentally Isolated Soils as allowed under the CT Remediation Standard Regulations (RSRs). This will require an Environmental Land Use Restriction (ELUR) to be placed on the land records.

During remediation activities conducted by the Town in 2004, the interior process equipment has been removed from the WWTP.

AOC-5 - Equalization Lagoon: An equalization lagoon was located north of the WWTP and clarifier. Prior to treatment, rinse waters and acid solutions were contained within the equalization lagoon.

The equalization lagoon had a synthetic liner to contain the liquids. This liner replaced an older liner in 1984 shortly before manufacturing operations ceased.

Several subsurface soil samples collected from the perimeter of the equalization lagoon during the Phase III ESA. No contamination was evident in those samples. No samples were collected from under the liner.

Monitoring wells are located immediately downgradient of the equalization lagoon. Based on sporadic sampling at the wells, no impacts are observed to groundwater at those wells.

During remediation activities conducted by the Town in 2004 the liner and associated piping was removed from AOC 5. Small amounts of impacted soil were also remediated along the piping and under the liner.

AOC-6 - Northwest Sludge Disposal Area: An area reportedly used to dispose of metal hydroxide sludge was located adjacent to the northwestern corner of the property. This area consisted of hummocky topography and dense vegetation. The area also contained several empty partially buried 55-gallon drums. According to a GZA report titled Preliminary Investigation of Prior Sludge Disposal Area, Former CBP Tube Mill Site dated September 1988, four test pit excavations were performed in this area within the sludge. GZA concluded that metal hydroxide sludge was buried in an area approximately 250 feet northwest of the Tube Mill building.

The sludge and soil was further investigation during the Phase III ESA and RFI. Results of these investigations indicated elevated mass and leachable metals, semi-VOCs and VOCs.

Two wells were installed. However, due to the existence of a local trough in the water table, the wells were not located immediately down

The Town completed remediation of AOC 6 in 2004. These efforts included the removal of metal hydroxide sludge and impacted soils.

AOC-7 - Interior Transformer Release Area: Currently, no transformers are present at the site. Three areas that formerly housed transformers containing PCB oils were observed in the main manufacturing area of the building as evidenced by the presence of electrical conduits. These areas were labeled as containing PCB containing transformers. Heavy staining was observed adjacent to these areas. A former transformer room was observed on the eastern section of the Tube Mill building.

Reportedly, this room held two transformers containing PCB oil located at the central and eastern sections of the room. These transformers have been removed from the site. Minimal staining was observed throughout the concrete floor adjacent to the former areas of the transformers.

According to a CTDEP Spill Report dated May 7, 1999, approximately five gallons of dielectric fluid (PCB containing oil) was discharged at the site from transformers located within the site building.

Accompanying the spill report, is an inspector's report and analytical results from samples collected at the five on-site transformers and other areas of concern within the site building. According to laboratory analytical results, the percentage of PCB containing liquid from the five on-site transformers ranged from 46% in Transformer 2

to 52% in Transformer 1. Dust from wipe samples collected adjacent to a steel stock pile indicate a PCB concentration of 0.044 parts per million (ppm) per wipe sample.

Previous wipe sampling conducted by the CTDEP indicated concentrations as high as 300,000 ppm. Analytical results of concrete chip samples collected by CTDEP personnel adjacent to travel areas near three transformers and a travel area located on the east side of the main building indicate that PCB concentrations ranged from 5.2 milligrams per kilogram (mg/Kg) near Transformer 1 to 78 mg/Kg near a travel area located on the east section of the main building. Several additional concrete chip and wipe samples were collected from various entrances and additional areas of concern. Concrete chip sample analysis indicated that PCB concentrations ranged from ND collected from an area located at the northeast corner of the main building to 7,100 mg/Kg collected from an area located adjacent to Transformer 5 within the electrical (transformer) room.

Wipe sample analysis indicated that PCB concentrations ranged from ND collected from an area located at the northeast corner of the main building to 0.88 ppm collected from an area adjacent to Transformer 5 within the electrical (transformer) room.

According to the spill report and associated inspector's report, approximately 2,527 gallons of PCB containing transformer oil were removed from the five transformers. The five transformers were removed in May 1999.

Field investigations that were conducted at AOC 7 during the Phase III ESA, RFI, and recent events are discussed in Section 3. Analytical results from those investigations are discussed in Sections 4 and 5.

AOC-8 - Dip Tank Area: An area containing a dip tank was located on the western interior section of the Tube Mill building. This dip tank was observed to consist of a lifting mechanism on which parts could be placed for cleaning. Piping runs from the dip tank through a concrete block wall to the outside.

Three samples were collected from this AOC during the Phase III ESA. Two samples were collected from soils from immediately below the concrete floor in the dip tank area and one from the surficial soils on the exterior of the building immediately under the suspect piping. Impacts to soils by a release from at this AOC were identified at the exterior sampling location.

The Town completed remediation at AOC 8 at the impacted exterior area in 2004.

AOC-9 - Southwest Potential Sludge Disposal Area: According to historical information (former Scovill Manufacturing/Century Brass employee interview by GZA) and historic aerial photographs, an area adjacent to the southwest corner of the Tube

Mill building may have been used as a disposal area, possibly for sludge disposal. Nine test pits were installed in this area in 1988 by GZA; however no soil samples were collected for chemical analysis from this area. Various debris items (e.g. drums tops, metal straps, charred wood, glass, cinders, brick, etc) and an object which resembled a dried acid crystal were observed in one test pit.

Natural sand, silt and gravel deposits were observed in the remaining eight test pits. According to historic aerial photographs, a dirt path way was observed leading from the southwest area of the Tube Mill building to an area on the western section of the study site. A pile of unknown material was observed at the end of this dirt road way.

Additional investigations were conducted during the RFI including a ground-penetrating radar survey and additional soil sampling. Results of these investigation indicated that disposal was likely not conducted and a release has not occurred to the environment in this area.

AOC-10 - Boiler Room: A boiler room is located on the eastern section of the Tube Mill building. This room contains three boilers which were supplied with No. 6 heating oil. Reportedly, these boilers generated steam which was used to heat the Tube Mill building and provide process water. The two southernmost boilers were installed with the initial construction of the facility in 1957. The northernmost boiler was added in the 1960s.

Various pits and trenches were observed adjacent to the boilers and a floor sump was observed on the northern section of the boiler room. Two floor drains were observed on the northern and southern sections of the boiler room.

According to a GZA Environmental Site Assessment dated December 1988, the floor drains and sumps located in the boiler room floor discharge into the facility's storm drains and eventually to the Housatonic River.

Several drums and containers are located throughout the northern and central sections of boiler room. These drums include one plastic 55-gallon drum labeled NB-11, two steel 55-gallon drums labeled NB-22, four steel 55-gallon drums labeled 7D-24 - fuel oil conditioner and terressic 68, one steel 55-gallon drum labeled draw well #20-X compound (possibly No. 6 heating oil based on visual observation), one steel 55-gallon drum unlabeled (possibly No. 6 heating oil based on visual observation), one steel 35-gallon drum labeled NB-11, and three plastic five-gallon containers which were unlabeled. Several of these drums were labeled Nutmeg Chemical Company, G. Whitefield Richards Company, Exxon, and Texaco.

One of the drums containing No. 6 heating oil was observed to had leaked in the past as evidenced by oil staining on and adjacent to the drum.

A heavy odor of volatiles was observed adjacent to the drums located at the northern section of the boiler room. Medium staining was observed adjacent to these drums.

A chemical storage area was observed on the northeastern section of the boiler room. This area contained wooden desks and shelves containing several labeled and unlabeled plastic and glass containers of various acids and reagents. Yellow staining and a small amount of caustic material were observed on the floor adjacent to the chemical storage area. An unidentified chemical odor was observed adjacent to this area. A stack was observed on the northern section of the boiler room. A pile of fibrous bricks was observed at the base of the stack.

Painted surfaces were heavily peeled throughout the boiler room area. Paint fragments were observed on the boiler room floor as well.

Contamination (ETPH) and low levels of various VOCs were evident in the sub-slab soils during the Phase III ESA and RFI. These soils will be left in place and considered Environmentally Isolated and Inaccessible since the building will be left in place. An ELUR will be filed on the land records.

AOC-11 - Floor Drain and Storm Water Drainage System: The site contains between 15 and 20 floor drains, catch basins, storm water outfalls, and manholes. These structures are located both on the exterior and interior of the Tube Mill building. The system drains to the West Aspetuck River through two outfalls and to the Housatonic River through one outfall (see Section 2.6).

Contaminants (ETPH, PCBs and various metals) were detected in the sediments in at several manholes. At the outfalls, ETPH was detected at outfall SWO-1 and PCBs and copper was detected at outfall SWO-3. Some remediation will be required in these areas.

AOC-12 - Northwest Area of Stressed Vegetation: An area of stressed or no vegetation was located adjacent to the northwest of the Tube Mill building. This area contained little to no vegetation and may be the result of a release or boat storage. Based on investigation conducted during the Phase III ESA and RFI, remediation is not required at this AOC.

AOC-13 - Northeast Area of Stressed Vegetation: An area of stressed or no vegetation was located adjacent to the northeast of the Tube Mill building. This area contained little to no vegetation and may be the result of a release or boat storage.

ETPH was detected about residential standards in the soil during the RFI.

The Town completed remediation at this AOC in 2004.

AOC-14 - Former Drum Storage Area: According to a GZA Environmental Site Assessment dated 1988, an area of stained soil approximately eight feet by four feet was observed adjacent to three 55-gallon drums located on the northeast side of the Tube Mill building. A sample was collected and screened for VOCs. A meter response of 1 part per million was observed on the organic vapor analyzer (OVA). During the Marin Phase I site inspection, evidence of staining or past releases were not noted in this area. One soil sample was collected during the RFI for the analysis of metals, ETPH, VOCs, and PCBs. Results on the sample analysis do not indicate the presence of any contaminants at concentrations above cleanup criteria.

AOC-15 - Container Storage Area 1: Sampling and remediation of container storage area 1 within the Tube Mill building is part of a CTDEP-lead RCRA closure plan for the site. No concrete chip, soil, or groundwater samples were collected from this container storage area during the Phase III ESA.

No investigation was performed during the Phase III ESA. One sample of the concrete and soil at this AOC was collected during the RFI for analysis of PCBs.

This AOC is currently being investigated and undergoing RCRA Closure by the Town.

AOC-16 - Container Storage Area 2: Sampling and remediation of container storage area 2 within the Tube Mill building is part of a CTDEP-lead RCRA closure plan for the site. No concrete chip, soil, or groundwater samples were collected from this container storage area during the Phase III ESA. One sample of the concrete and soil at this AOC was collected during the RFI for analysis of PCBs.

This AOC is currently being investigated and undergoing RCRA Closure by the Town.

AOC-17 - Laboratory Container Storage Area: A laboratory, formerly used to test tubing for imperfections or overstressing of tubing, was located on the eastern section of the Tube Mill building. During the Marin Phase I, these rooms were empty but contained a number of work areas made up of sinks, desk space, and exhaust hoods. Cabinets, desks and shelves in the laboratory were noted to be empty. One large plastic container of blue liquid was observed in the northeast corner of the central laboratory room. No unusual floor staining or odors were observed in this area.

Reportedly, a storage area, formerly used to store a mercuric nitrate solution, was located in the laboratory. During the Marin Phase I ESA, a laboratory storage area was not identified.

No contaminants were identified in the soils or concrete during the Phase III ESA.

AOC-18 - Scrap Metal Storage Area: A scrap metal storage area was observed on the southwestern exterior of the wood shop area. This area was contained within a chain link fence and was not accessible due to a locked gate. The scrap metal storage area was observed to be empty except for a few areas containing pieces of steel pipes, and heating and ventilation parts. Two rusty tanks of unknown capacity were on the ground and appeared to be empty. According to a GZA Environmental Site Assessment dated December 1988, two areas of oil staining were observed off the edge of this storage area.

One 275-gallon AST was observed adjacent to the south of the scrap metal storage area. A placard identifying the tank as containing flammable liquid was present on the side of the tank. The tank was identified as property of the Norbert E. Mitchell Company. This AST was removed from the site during remediation activities conducted by the Town in 2004.

During the Phase III ESA and RFI, no contaminants were detected in the soil above cleanup criteria.

AOC-19 - Former Farmland: Landscaped areas and vacant land were observed adjacent to the north, south, east, and west of the Tube Mill building. According to historic aerial photographs, the site was used as farmland previous to site development in approximately 1957. A large field is located west of the Tube Mill building and was historically used as farmland.

During the Phase III ESA, four soil samples were collected from the former farmland. No contaminants (pesticides or herbicides) were identified in those samples.

AOC-20 - Pickling Pit 1: According to Scovill Manufacturing Tube Mill Part Plumbing Plans Sections 1-3 dated June 1957, Pickling Pit 1 was located centrally along the eastern interior wall of the former manufacturing area of the Tube Mill building. This area could not be directly observed during the Marin Phase I ESA because the pit was capped with concrete.

During the Phase III ESA, a contaminant (ETPH) was identified in the concrete but not detected in the soils.

AOC-21 - Pickling Pit 2: According to Scovill Manufacturing Tube Mill Part Plumbing Plans Sections 1-3 dated June 1957, Pickling Pit 2 was located centrally along the northern interior wall of the former manufacturing area of the Tube Mill building. This area could not be directly observed during the Marin Phase I ESA because the pit was capped with concrete.

During the Phase III ESA, no contaminants were identified in the concrete or soils.

AOC-22 - Pickling Pit 3: According to Scovill Manufacturing Tube Mill Part Plumbing Plans Sections 1-3 dated June 1957, Pickling Pit 3 was located on the central section of the former manufacturing area of the Tube Mill building. This area could not be directly observed during the Marin Phase I ESA because the pit was capped with concrete.

During the Phase III ESA, contaminants (low levels of PCBs, VOCs and metals) were identified in the concrete but not detected in the soils.

AOC-23 - Pickling Pit 4: According to Scovill Manufacturing Tube Mill Part Plumbing Plans Sections 1-3 dated June 1957, Pickling Pit 4 was located on the south-central section of the former manufacturing area of the Tube Mill building. This area could not be directly observed during the Marin Phase I ESA because the pit was capped with concrete.

During the Phase III ESA, contaminants (low levels of several metals) were identified in the concrete and soils.

3.1 PHASE III ENVIRONMENTAL SITE ASSESSMENT

The following sections detail the field investigations that were conducted for PCBs during the Phase III Environmental Site Assessment (ESA) by Marin Environmental, Inc (Marin) in 2000. The sections were derived from the Marin Phase III ESA Report dated December 2000.

3.1.1 AOC-7 - Interior Transformer Release Area

The interior of the site building was investigated in two different patterns during the Phase III ESA: in a grid pattern based on 100-foot centers throughout the building (B-1 through B-34; 34 locations), and in a grid pattern based on ten-foot centers in a 40-foot by 40-foot area surrounding the five previously-removed transformers (T1-1 through T1-21, T2-1 through T2-21, T3-1 through T3-21, T4-1 through T4-20; 83 locations). Sampling locations are shown on Figure 4.

Several different mediums inside the site building were sampled, including soil, concrete, and groundwater. At least three samples were collected at each node of the grid as follows:

- . a two- to three- inch diameter core was drilled through the concrete floor;
- . the top one inch of the core was collected as the first sample;
- . the bottom of the concrete floor was collected as the second sample; and
- . the third sample was a composite of the one-foot interval of soil immediately below the concrete floor.

The analysis of the concrete was performed on a phased approach. The first sample (concrete) (top 1- inch) at all nodes was analyzed for PCBs. At the locations in which the PCB concentration of the first sample (concrete) exceeded 1 mg/Kg, the second sample (concrete) was analyzed. At locations in which the PCB concentration of the second sample exceeded 1 mg/Kg, the third sample (soil) was analyzed.

Four subsurface soil samples exceeding 1 mg/Kg total PCB concentration collected from the building wide grid and the areas of former transformers were analyzed for SPLP PCBs.

According to the Marin QAPP, soil samples were to be collected at all proposed interior boring locations. The sampling location at T1-11 was noted to have in excess of 27 inches of concrete exceeding the capability of the field equipment and, therefore, a soil sample was not able to be collected.

The concrete at this location and depth was sampled and analyzed for PCBs. In addition, the grid systems associated with former transformer area four and five were consolidated to one grid system since both former transformer areas were located within the former transformer room. Marin modified the grid system to one series of sampling locations (T4-1 through T4-20) throughout the room including both former transformer locations.

3.1.2 Interior Monitoring Well Installation and Sampling

Four monitoring wells (MW-T1, MW-T2, MWT3 and MW-T4) were installed in the builder interior near at the locations of the former transformers. Subsurface soil samples were from the soil borings that were converted to monitoring wells. Areas of unusual cracking or staining adjacent to the former transformer areas were evaluated first as potential boring locations. The sampling was performed in borings completed using a coring machine and conventional drilling techniques (i.e. hollow stem augers). Locations of monitoring wells are shown on Figure 4.

At each boring location, undisturbed subsurface soil samples were collected continuously to the water table. Representative samples of the subsurface soils were collected over each two-foot interval and were submitted for PCB analysis. The sample under the slab, the two to four foot depth sample, and the four to six foot depth sample were analyzed for PCBs. The remaining samples to the water table were retained by the laboratory for further analysis if warranted. Analysis was to be conducted on these samples if the shallower sample exceeded 1 mg/Kg.

Upon reaching the water table at each boring location, the boring was advanced to a depth of approximately seven feet below the existing water table and a monitoring well was installed. A two-inch diameter, 0.010-inch slotted PVC monitoring well with a ten-foot screened horizon was installed in the boring. The screened horizon was installed to straddle the water table.

Upon completion, these new wells were surveyed by Marin into the existing monitoring well network to an established benchmark. These wells were surveyed to evaluate groundwater flow direction at the site.

The four newly installed groundwater monitoring wells (MW-T1, MW-T2, MW-T3 and MW-T4) and pre-existing groundwater monitoring well GZ-4 were sampled in association with this AOC investigation. Groundwater samples were collected using the low-flow methodology. The groundwater samples collected from MW-T1, MW-T2, MW-T3 and MW-T4 were submitted to the laboratory and analyzed for PCBs. The groundwater sample collected from GZ-4 was submitted to a Connecticut-certified laboratory and analyzed for PCBs, TPH, and total site metals.

According to the Marin QAPP, pre-existing monitoring well GZ-6 was to be sampled in association with this AOC. However, monitoring well GZ-6 was observed to be damaged. Marin personnel attempted to sample this well with two different sized steel bladder pumps but the bend in the PVC would not allow for either of the two pumps to be lowered further than approximately 5 feet below the top of the steel casing. In addition, GZ-4 was proposed to only be sampled for PCBs and total site metals. Due to the inability to sample GZ-6, monitoring well GZ-4 was sampled for TPH.

3.1.3 Exterior Door and Interior Pit/Trench Samples

Scrape, asphalt and concrete samples (EBD-1, EBD-1A through EBD-1E, EBD-1-G1 through EBD-1-G45, EBD-2, EBD-2A through EBD-2E, EBD-2-G1 through EBD-2-G45, EBD-3, EBD-4, EBD-4A and 4B, EBD-5, EBD-5A and 5B and EBD-6) were collected from six of the exterior bay door entrances to building. Scrape samples were submitted to a laboratory and analyzed for PCBs. An asphalt background sample (Bkgd-1) was collected from the parking area east of the guard house. This sample was collected to compare PCB concentrations from an area presumed not exposed to PCBs like the exterior areas adjacent to the six bay doors. Locations of scrape samples are shown on Figure 4.

As outlined in the Marin QAPP, six scrape samples were to be collected from the exterior areas adjacent to six of the bay doors. Additional samples were collected from EBD-1, EBD-2, EBD-3, EBD-4, and EBD-5 in order to further delineate contamination that is present within the media sampled.

Four sand samples were collected from four pits/trenches located throughout the building. Four sand samples were collected from four pit/trench locations (SANDNW-1, SAND-NE-2, SAND-SE-3, and SAND-SW-4) located at the northwest, northeast, southeast, and southwest areas of the Tube Mill building. Sand samples were collected from the top foot from each of the locations. Sand samples exhibiting the greatest impacts based on visual observation and PID readings from each location were analyzed for mass site metals, ETPH, and PCBs.

3.1.4 Floor Drain and Storm Water Drainage System

The site contains between 15 and 20 floor drains, catch basins, storm water outfalls, and manholes. These structures are located both on the exterior and interior of the Tube Mill building. The system drains to the West Aspetuck River through two outfalls and to the Housatonic River through one outfall.

During the Phase III ESA, sediment samples were collected from areas containing floor drains, storm water outfalls, catch basins, and manholes located throughout the site. Thirty five sediment samples were collected.

Twenty five samples (SWO-1, SWO-2, SWO-3, SWO-3A, SWO-3B, SWO-3-G1 through SWO-3-G20) were collected from the three storm water outfalls located on the northern and southern sections of the site located at the West Aspetuck and Housatonic Rivers, respectively. Ten sediment samples (FD-BR-1, FDTM-N, FD-TM-E, FD-TM-S, FD-TM-W, MH-SE-1, MH-WWTP-1, CB-SE-1, FD-CP-1, and MH-NE-1) were collected from various floor drains, catch basins, and manholes. Sediments exhibiting the greatest impacts based on visual observations were collected and submitted to the laboratory. These sediment samples were analyzed for mass site metals, VOCs, and PCBs. Sediment samples SWO-3A, SWO-3B, and SWO-3-G1 through SWO-3-G20 were analyzed for PCBs only. Sediment sampling locations are shown on Figures 4 and 5.

3.1.5 Other AOCs

Sampling and analysis for PCBs was also conducted during the Phase III ESA at other AOCs were the primary contaminant of concern (COC) was not PCBs. These AOCs include the AOC 8 – Dip Tank Area, AOC 9 – Southwest Sludge Disposal Area, AOC 10 – Boiler Room, AOC 12 – Northwest Area of Stressed Vegetation, AOC 13 – Northeast Area of Stressed Vegetation, AOC 14 – Former Drum Storage Area, AOC 17 - Laboratory Container Storage Area, and AOCs 20 to 23 – Pickling Pits.

Results of the Phase III ESA concluded that PCBs were not a primary COC at these areas. The details of the sampling and analytical results are provided in the Marin Phase III ESA dated December 2000.

3.2 RCRA FACILITY INVESTIGATION

The following sections detail the field investigations that were conducted for PCBs during the RCRA Facility Investigation (RFI) conducted by Tighe & Bond, Inc. (Tighe & Bond) in 2003. The sections were derived from the draft RFI Report dated July 2003.

3.2.1 PCB Core Sampling and Analysis

On March 31, 2003, soil samples were collected from the first six inches of soil below the concrete slab at coring locations B-35 through B-39. On April 7, 2003, the top ½-inch and the bottom ½-inch of the concrete slab were collected from the concrete core at location B-39. On April 8, 2003, the top ½-inch and the bottom ½-inch of the concrete slab were collected from the concrete core at locations B-35, B-36, B-37 and B-38. The concrete samples were analyzed for PCBs by EPA Method 8082. Sampling locations are shown on Figure 2.

3.2.2 PCB Wipe Sampling and Analysis

On April 11, 2003, 21 PCB wipe samples were collected from six locations along the walls and three selected areas of the ceiling structure. At each wall location, a sample was collected at heights of 5, 15, and 25 feet above the finished floor for a total of three samples per location. Each sample was collected after a 10-centimeter by 10-centimeter template was taped to the wall with its center at the respective sampling height. After the template was attached, a wipe sample was collected in accordance with the field SOP 29 in the February 2003 QAPP Addendum. The wipe samples were analyzed for PCBs by EPA Method 8082.

Three wipe samples were collected from selected representative areas of structures near the ceiling. This structure was the ceiling I-frame that supported the roof. Wipe samples were collected in flat areas of the structure where dusts and PCBs would potentially accumulate.

Wipe sampling locations are shown on Figure 2.

3.2.3 PCB Pilot Test

On April 7, 8, and 28, 2003, 32 concrete samples were collected from two areas that were designated for pilot testing utilizing an extraction solution. The sample identification for the pilot test area is as follows:

PT-test area-location-(depth interval)

Where:

Test Area is 1 or 2

Location is sampling location 1, 2, 3 or 4 within the test area

Depth interval is one of four intervals:

- 0 to 0.5 in.;
- 0.5 to 1.0 in.;
- to 1.5 in.; or
- 1.5 to 2.0 in.

The dimension of each pilot area was approximately 10 feet by 10 feet. Locations of the pilot test areas are shown on Figure 2. Within each selected area, four locations were selected for sample collection. At each sampling location, a concrete sample was collected from four depth intervals, 0.0 to 0.5 in., 0.5 to 1.0 in., 1.0 to 1.5 in. and 1.5 to 2.0 in.

The samples were collected in accordance with EPA concrete sampling SOP. Note that at each location, multiple core holes were required to collect sufficient sample volume. Sampling rationale for these areas is provided in the February 2003 QAPP Addendum.

On May 2, 2003, the pilot test areas were decontaminated using TechXtract® solvent cleaner. The cleaning was performed by Clean Harbors of Bristol Connecticut, under observation of Tighe & Bond personnel.

A single cycle of cleaning was performed. The cycle consisted of the serial application of three proprietary solvents with a clean water rinse. The dwell time was approximately 1 hour.

The second set of samples was collected in similar fashion as the first set after the solvent cleaning. Sampling rationale for this phase of the pilot test is provided in the February 2003 QAPP. Sixteen concrete samples (PT-1-1A(0-0.5 in.) through PT-1-4A (0-0.5 in.), PT-2-1A (0-0.5 in.) through PT-2-4A (0-0.5 in.), PT-1-1A (0.5-1 in.) through PT-1-4A (0.5-1 in.) and PT-2-1A (0.5-1 in.) through PT-2-4A (0.5-1 in.)) were collected from the same study areas as part of the second phase of the pilot test.

3.2.4 Dioxin-Like PCB Sampling and Analysis

On April 7 2003, three concrete samples (B-40, B-41, and B-42) were collected from three areas adjacent to the locations of the former transformers. These areas were selected because of the elevated concentrations of PCBs were detected in the adjacent concrete. Sample B-40 was collected adjacent to transformer T1; B-41 from transformer T2; and, B-42 was collected from transformer T4. At each sampling location, one concrete sample was collected as a composite from one depth interval (0.0 to 0.5 in). The samples were collected in accordance with EPA concrete sampling SOP.

Note that at each location, multiple core holes (~30 to 40) were required to collect sufficient sample volume. Sampling rationale of these areas is provided in the February 2003 QAPP Addendum.

Initially, the samples were analyzed for PCBs by EPA Method 8082. After review of the PCB results, dioxin-like analysis was performed on select samples.

3.2.5 Sediment Sampling

Eight sediment samples were collected from designated areas within the West Aspetuck and Housatonic Rivers for laboratory analysis. Sediment samples were analyzed for site metals, PCBs, and ETPH. Sampling locations were selected through discussion

and site inspection with EPA staff. Sediment sampling locations are shown on Figure 2.

3.2.6 Groundwater Sampling

From April 17 to April 29, 2003, Tighe & Bond personnel collected groundwater samples from all existing wells at the site, one monitoring well off-site, and three residential water supply wells. Low flow purging and sampling procedures were performed at each monitoring well location in accordance with the May 1996 EPA protocols. Purging and sampling were performed using a QED Sample Pro SP ¾-inch Micropurge Bladder pump with dedicated Teflon tubing.

The pump intake depths were selected to coincide with the center-of-saturated-screen elevations. The purged volumes were based on the stabilization of field-measured water quality parameters, including: dissolved oxygen, specific conductance, temperature, pH, turbidity, and oxidation/reduction potential. Field parameters were generally measured at five to ten minute intervals along with monitoring of purging rates and water levels. No purged waters exhibited odors and/or a sheen. Samples were collected upon stabilization of the field parameters within acceptable limits for three consecutive readings.

Water from the residences were collected after purging the piping of standing water by opening the tap for 5 to 10 minutes. The field measured parameters were measured using an aliquot of the sampled water.

The samples were analyzed for VOCs, ETPH, PCBs, site metals, and SVOCs.

3.3 SECOND PCB PILOT TEST

A second PCB pilot test was performed after the RFI in August 2003 to further evaluate the feasibility for cleaning the concrete slab utilizing the solvent cleaner. Results of the first pilot test using the solvent on two selected areas were encouraging but suggested that additional applications of the solvent were required to meet the cleanup objectives. The average reduction in PCB levels following the initial pilot test was 50 percent.

To achieve the cleanup goal, an average of 98 percent reduction in PCB levels would be required. According to the manufacturer's instructions, to achieve a 98 percent reduction, several applications of the solvent are needed. The second PCB pilot test was performed using additional solvent applications with longer duration times at the areas subjected to the initial pilot testing.

Methodology

The overall rationale for the PCB pilot test is provided in the QAPP Addendum dated February 24, 2003. Two areas were selected based on initial PCB levels and mechanism for migration.

The initial PCB concentrations in the upper surface of the concrete slab at the proposed pilot test areas varied between 9.3 and 21.4 mg/Kg. At Pilot Test Area 1, the mechanisms for migration included direct solvent spillage, mechanical transport and possibly water-aided dispersion due to the leaks in the roof.

At Pilot Test Area 2, the mechanism for migration consisted primarily of mechanical and fugitive dust transport. On August 11, 2003, two pilot test areas previously subjected to solvent application using TechXtract® solvent cleaner were pilot tested again. The cleaning was performed by Clean Harbors of Bristol, Connecticut, under observation of Tighe & Bond personnel. Two cycles of cleaning were performed during the second pilot test. A cycle consisted of the application of three proprietary solvents with a clean water rinse. In accordance with the manufacturer's recommended procedures, the dwell time that the solvent was left on the concrete prior to rinse in the initial cycle was approximately 1 hour and the dwell time prior to the final rinse on the final cycle was overnight (approximately 16 hours). Waste solvent was collected, drummed and sampled for waste characterization. The waste solvent will be properly disposed of off-site at a licensed facility.

On August 12, 2003, 16 concrete samples were collected from both pilot test areas. The sample identification for the pilot test area is as follows:

PT-test area-location-(depth interval)

Where:

Test Area	is 1 or 2
Location	is sampling location 1B, 2B, 3B or 4B within the test area
Depth interval	is one of two intervals: • 0 to 0.5 in.; • 0.5 to 1.0 in.;

The samples were collected in accordance with the EPA concrete sampling SOP. Sampling rationale for these areas is provided in the February 2003 QAPP Addendum. At each sampling location, a concrete sample was collected from two depth intervals, 0.0 to 0.5 inches and 0.5 to 1.0 inches. No samples were collected from below one inch during this sampling event. As before, multiple core holes were required to collect sufficient sample volume. All concrete samples collected in August 2003 were analyzed for PCBs by EPA Method 8082.

3.4 ADDITIONAL POROUS AND NON-POROUS SAMPLING

During the preparation of this plan and the bid specifications, additional samples of porous and non-porous materials were collected inside the building to further characterize these materials and form the basis for the bid specifications.

Sampling was conducted on October 1, October 7, and November 2, 2004. Twenty one samples of representative porous materials located throughout the building interior were collected for analysis. Thirty two wipe samples of representative non-porous materials located throughout the building interior were collected for analysis. Both porous and non-porous sampling were conducted in accordance with the site-specific protocols detailed in the February 2003 QAPP Addendum.

3.5 HAZARDOUS BUILDING MATERIALS SURVEY

Marin conducted a hazardous building materials survey in the fall of 2002. The survey was conducted to provide an assessment of asbestos containing materials, lead-based paint, polychlorinated biphenyls (PCB) containing ballasts, and fluorescent lamps containing mercury vapors prior to site demolition or renovation.

The survey concluded that asbestos containing pipe insulation, boiler insulation, breech insulation, insulation debris, floor tile and mastic, window frame caulking, mudded fitting insulation, glue daubs, tar on metal siding, roof flashing felts, and roof tar are present at the site. Lead-based paint in significant amounts was identified on the wood garage doors, structural steel, exterior metal wood shop duct, clarifier, and raw materials storage tank within the WWTP. Suspect PCB containing ballasts and mercury containing lamps were also identified at the site. The survey also indicated approximate costs to remove all identified hazardous materials prior to site demolition or site renovation. Results of the survey are contained in a report entitled *Hazardous Materials Survey, Former Century Brass Products* dated October 2000.

To confirm the results of the Marin survey and to provide additional data in support of the bid specifications, Tighe & Bond performed a hazardous materials inspection in the spring of 2004. Results of the inspection confirmed the results of the earlier Marin survey as well as identifying several new materials. Results of the inspection are contained in a report entitled *Hazardous Materials Inspection and Cost Estimate, Century Enterprise Center* dated May 2004.

4.1 PHASE III ENVIRONMENTAL SITE ASSESSMENT

The following sections detail the analytical results from the investigations that were conducted during the Phase III Environmental Site Assessment (ESA) by Marin Environmental, Inc (Marin) in 2000. The sections were derived from the Marin Phase III ESA Report dated December 2000.

4.1.1 AOC 7 - Former Transformer Area

The interior of the site building was investigated during the Phase III ESA in two different patterns: in a grid pattern based on 100-foot centers throughout the building (B-1 through B-34; 34 locations), and in a grid pattern based on ten-foot centers in a 40-foot by 40-foot area surrounding the five former transformers (T1-1 through T1-21, T2 -1 through T2-21, T3-1 through T3-21, T4-1 through T4-20; 83 locations). A summary of concrete and soil analytical results for the building wide grid and transformer grid is provided in Tables 1 and 2, respectively. PCB sampling locations and the extent of impacted media for AOC-7 is shown in Figure 4.

Building Wide Grid

Concerning the building wide boring grid (B-1 through B-34), laboratory analytical results indicate that PCBs were detected in the top 1 inch of concrete (C1) ranging from ND to 9.3 mg/Kg from B-1 through B-34. The bottom 1 inch of concrete (C2) collected from B-1 through B-34 range from ND to 5.7 mg/Kg. The sub-slab soil sample (S1) collected from the location of B-4 was the only sub-slab soil sample from the building wide boring grid which exceeded the cleanup level for High Occupancy Areas (1 mg/Kg) and the Residential Direct Exposure Criteria (RES DEC) (1 mg/Kg). In order to delineate the vertical extent of the contamination, additional soil samples were collected from the 2-3 foot and 3-4 foot intervals at B-4 below the sub-slab. Laboratory analytical results indicate that PCBs were not detected in the deeper soils from these locations.

Transformer Grids

At the transformer areas (T1 through T4), laboratory analytical results indicate that PCBs were detected at concentrations ranging from ND to 17,000 mg/Kg at the concrete samples collected from the top 1 inch. PCBs were detected in concrete samples collected from the bottom 1 inch ranging from ND to 20 mg/Kg. PCBs were only detected in soil samples T1-6-S1 and T2-15-S1 exceeding the cleanup level for High Occupancy Areas (1 mg/Kg) and the RES DEC (1 mg/Kg). In order to delineate the vertical extent of contamination in these areas, additional soil samples were collected from the 2-3 foot and 3-4 foot intervals from these locations.

Laboratory analytical results indicate that PCBs were not detected in the deeper soils at these locations. The concrete at T1-11 was observed to be in excess of 27 inches thick as discussed in Section 3.1.1. A concrete sample was collected at this depth. Analytical results indicate that PCBs exceeded the cleanup level for High Occupancy Areas (1 mg/Kg) and the RES DEC (1 mg/Kg) in the concrete sample collected from the depth of 27 inches at T1-11. PID readings were observed to be non-detect for soil samples collected from these areas.

On October 11, 13, and 16, 2000, twelve subsurface soil samples (MW-T1 (0-2 ft), MWT1 (2-4 ft), MW-T1 (4-6 ft), MW-T2 (0-2 ft), MW-T2 (2-4 ft), MW-T2 (4-6 ft), MW-T3 (0-2 ft), MW-T3 (2-4 ft), MW-T3 (4-6 ft), MW-T4 (0-2 ft), MW-T4 (2-4 ft), and MW-T4 (4-6 ft)) were collected from four soil borings where five transformers were formerly located. The remaining samples to the water table were retained by the laboratory for further analysis if warranted. Subsurface soil consists of medium dense, brown, fine to medium sand with trace gravel. PID readings were observed to be non-detect in soil samples collected from these locations. Laboratory analytical results indicate that PCBs exceeded the cleanup level for High Occupancy Areas (1 mg/Kg) and the RES DEC (1 mg/Kg) in soil sample MW-T1 (2-4 ft) with a concentration of 2.5 mg/Kg. PCBs were not detected in the soil sample collected from the next interval (MW-T1 (4-6 ft)). PCBs were not detected in the remaining samples collected from these areas.

Four sub-slab soil samples (T1-6-S1, MW-T1 (2-4 ft), T2-15-S1, and B-4-S1) collected from the building wide grid and the areas of former transformers exceeding 1 mg/Kg total PCB concentration were analyzed for SPLP PCBs. Laboratory analytical results indicate that PCBs via SPLP were not detected.

4.1.2 Groundwater

From October 25 through 30, 2000, the four newly installed groundwater monitoring wells (MW-T1, MW-T2, MW-T3 and MW-T4) and pre-existing groundwater monitoring well GZ-4 were sampled in association with this AOC investigation. Laboratory analytical results indicate that no PCBs or other COCs were detected in the groundwater samples collected from these wells. Locations of monitoring wells are shown on Figure 2.

4.1.3 Exterior Doors and Pit/Trenches

Exterior Doors

On October 5, November 18 and 21, and December 6, 2000, 112 scrape soil, asphalt and concrete samples were collected from six of the exterior bay door (EBD) entrances to the building.

Laboratory analytical results indicate that five locations adjacent to EBD-1 (transformer room bay door), four locations adjacent to EBD-2 (large bay door located on the northeast side of the Tube Mill building), one location adjacent to EBD-4 (bay door on the north side of Tube Mill building), and one location adjacent to EBD-5 (large bay door located on the western side of the Tube Mill building) exceeded the cleanup level for High Occupancy Areas (1 mg/Kg) and the RES DEC (1 mg/Kg). A summary of analytical results from the Phase III ESA for the exterior door investigation is provided in Table 3. Sampling locations are shown on Figure 4.

Both EBD-4 and EBD-5 have been horizontally delineated and are assumed to vertically extend approximately one foot below grade. However, EBD-1 and EBD-2 were not horizontally and vertically defined and expanded sampling grids (EBD-1-G1 through EBD-1-G45 and EBD-2-G1 through EBD-2-G45) were applied to these two areas. Laboratory analytical results indicate that PCB concentrations in EBD-1-G18 (10 mg/Kg), EBD-1- G35 (2.7 mg/Kg) and EBD-1-G43 (1.6 mg/Kg) were detected above the cleanup level for High Occupancy Areas (1 mg/Kg) and the RES DEC (1 mg/Kg). In association to the grid sampling, deeper samples were collected at EBD-1B (EBD-1B (6 in)) and EBD-1C (EBD-1C(6-12 in)) due to high concentrations of PCBs in the original scrape sample at those locations. Analytical results indicate that PCBs were detected in the asphalt sample collected from EBD-1B (6 in) at a concentration of 2.9 mg/Kg exceeding the cleanup levels. Laboratory analytical results indicate that PCB concentrations in EBD-2-G8 (4.5 mg/Kg), EBD-2-G13 (10 mg/Kg), and EBD-2-G14 (3.8 mg/Kg) were detected above the cleanup levels.

Samples collected from EBD-3 and EBD-6 were reported as having PCB concentrations of non-detect and/or below the cleanup levels. A background sample (Bkgd -1) was collected from the parking area east of the guard house. Laboratory analytical results indicate that no PCBs were detected in Bkgd-1.

Pit/Trench Samples

On October 18, 2000, four sand samples (SAND-NW-1, SAND-NE-2, SAND-SE-3, andSAND-SW-4) were collected from four pits/trenches located at the northwest, northeast, southeast, and southwest areas of the Tube Mill building. No PID readings were observed in the sand samples collected from these areas. Laboratory analytical results indicate that no compounds were detected exceeding the cleanup level for High Occupancy Areas (1 mg/Kg) and the RES DEC (1 mg/Kg). A summary of analytical results for the pit/trench investigation is provided in Table 4.

4.1.4 Floor Drain and Storm Water Drainage System

Floor Drains, Manholes, and Catch Basins

Ten sediment samples were collected from floor drains inside the building and manholes and catch basins throughout the exterior of the site. PCBs were detected in all 6 samples collected from the interior floor drains at concentrations ranging from 1.2 to 73 mg/Kg. PCBs were only detected in one of the three manhole samples, at a concentration of 0.88 mg/Kg. PCBs were not detected in the one catch basin sampled.

Storm Water Outfalls

A total of 25 sediment samples were collected from the one outfall located on the Housatonic River (SWO-3) and two storm water outfalls located on the West Aspetuck River (SWO-1 and SWO-2). PCBs were not detected in the sediments at SWO-1 and SWO-3.

PCBs were detected at SWO-3 at a concentration of 0.91 mg/Kg. Twenty two additional samples were collected to delineate the horizontal extent of the PCB contamination at the outfall. Laboratory analytical results indicate that PCBs were detected in four samples above the cleanup level for High Occupancy Areas (1 mg/Kg) and the RES DEC (1 mg/Kg). The additional sampling delineated the extent of contamination at the outfall.

A summary of analytical data for sediment samples collected from the floor drains, catch basin, manholes, and storm water outfalls is provided in Table 5. Sampling locations are shown on Figures 4 and 5.

4.2 RCRA FACILITY INVESTIGATION

The following sections detail the analytical results from the investigations that were conducted during the RCRA Facility Investigation (RFI) conducted by Tighe & Bond, Inc. (Tighe & Bond) in 2003. The sections were derived from the draft RFI Report dated July 2003.

4.2.1 Concrete

4.2.1.1 Core Samples

Five concrete core samples (B-35, B-36, B-37, B-38, and B-39) were collected from AOCs 7, 15 and 16 during the RFI. Concrete from the top 0.5 in. and bottom 0.5 in. of the core was collected for analysis. In addition, the top six inches of soil from beneath the core was collected. Results of the concrete core analyses are summarized in Table 6. Sampling locations are shown on Figure 2.

Two PCB Aroclors were detected in five of the concrete core samples collected for PCB analysis from the site at the following concentrations:

- Aroclor 1262, five samples, 1 to 39.4 mg/Kg; and
- Aroclor 1260, two samples, 2.54 and 7.78 mg/Kg

One PCB Aroclor was detected in all three of the soil samples collected from below the concrete core at the following concentrations:

- Aroclor 1268, 0.205 to 0.575 mg/Kg.

PCB levels in the concrete exceed the cleanup level for High Occupancy Areas (1 mg/Kg) and the RES DEC (1 mg/Kg). PCB levels in the soils underneath the slab are below this cleanup level.

4.2.1.2 Dioxin-Like Samples

Three concrete samples (B-40 (0-0.5 in.), B-42 (0-0.5 in.) and PT-1-1 (0-0.5 in.)) were subjected to PCB congener analysis for dioxin-like PCBs as described in Section 3.2.4. Results of the Aroclor and dioxin-like PCB congener analyses are summarized in Table 7.

Three PCB Aroclors were detected in four of the concrete samples collected for PCB analysis from these areas at the following concentrations:

- Aroclor 1248, one sample, 17,400 mg/Kg;
- Aroclor 1260, three samples, 34,600 to 171,000 mg/Kg; and
- Aroclor 1262, one sample, 35.3 mg/Kg.

Six PCB congeners were detected in three of the concrete samples collected for dioxin-like analysis. The congeners, number of samples, and concentrations are as follows:

- Congener PCB 105, three samples, 0.210 to 310 mg/Kg;
- Congener PCB 118, three samples, 0.470 to 730 mg/Kg;
- Congener PCB 156, three samples, 0.190 to 350 mg/Kg;
- Congener PCB 157, two samples, 0.017 and 27 mg/Kg;
- Congener PCB 167, three samples, 0.077 to 110 mg/Kg; and
- Congener PCB 189, three samples, 0.062 to 110 mg/Kg.

4.2.2 Sediments

Eight sediment samples (SED-WA -1 through SED-WA-4 and SED-HR-1 through SED-HR-4) were collected from eight locations on the West Aspetuck and Housatonic Rivers during the RFI. Results of the sediment analyses are summarized in Table 8. Sampling locations are shown on Figure 2.

Seven of the site metals were detected in the sediment samples. The following metals were detected in the indicated number of samples and concentration range:

- Barium, eight samples, 16.8 to 104 mg/Kg;
- Chromium, eight samples, 3.65 to 157 mg/Kg;
- Copper, six samples, 3.47 to 1,140 mg/Kg;
- Lead, six samples, 3.22 to 49.3 mg/Kg;
- Nickel, five samples, 3.26 to 35.0 mg/Kg;
- Mercury, one sample, 0.304 mg/Kg; and
- Zinc, eight samples, 16.5 to 855 mg/Kg.

No PCB compounds were detected in eight sediment samples collected for PCB analysis from the site.

ETPH was detected in all of the sediment samples collected from the site ranging in concentration from 16.6 to 235 mg/Kg.

4.2.3 Groundwater

Twenty-nine groundwater samples were collected for analysis from the site during the RFI. Results of the groundwater analyses including data from previous investigations are summarized in Table 9. Locations of monitoring wells are shown on Figure 2.

Six metals were detected in the groundwater samples. The following metals were detected in the indicated number of samples and concentration range:

- Aluminum, one sample, 1,860 micrograms per liter (ug/L);
- Barium, 24 samples, 11 to 132 ug/L;
- Chromium, two samples, 8 and 6 ug/L;
- Copper, three samples, 12 to 101 ug/L;
- Iron, five samples, 147 to 3,060 ug/L; and
- Manganese, four samples, 53 to 1,050 ug/L

Arsenic, cadmium, lead, nickel, selenium, silver, zinc, and mercury were not detected in any of the groundwater samples collected for metals analysis.

ETPH was detected in one of the 29 groundwater samples collected from the site at a concentration of 0.34 mg/L.

Three VOCs were detected in the groundwater samples collected from the site. The following VOCs were detected in the indicated number of samples and concentration range:

- 1,2,3- Trichlorobenzene, one sample, 2 micrograms per liter (ug/L)
- 1,2,4-Trichlorobenzene, one sample, 2 ug/L; and
- Methyl-tert-butyl-ether, three samples, 10 to 48 ug/L;

No SVOCs were detected in the one groundwater sample for which SVOCs were analyzed.

PCBs were detected in groundwater samples from MW-2003-3 and SD-2 which are located near AOC 6. Subsequently, these samples were re-analyzed to confirm the presence of PCBs in these samples. The re-analysis of these samples indicated that PCBs were non-detect.

One parameter exceeded its respective groundwater criteria. The parameter and criteria that was exceeded are provided below

- ETPH of 0.36 milligrams per liter at U-1S
  - Groundwater Protection Criteria

4.2.4 Pilot Test Samples

Analytical results of samples collected prior to the solvent cleaning are summarized on Table 10. The location of the pilot tests are shown on Figure 2. Aroclor 1262 was detected in all samples from both pilot test areas. The PCB concentrations in the top 0.5 in. depth interval varied between 12.4 and 35.3 mg/Kg. The PCB concentrations in the 0.5 to 1.0 in. depth interval varied between 0.954 and 7.58 mg/Kg. Below one inch, the PCB concentrations varied from non-detectable levels to 0.766 mg/Kg.

Analytical results of samples collected after the solvent cleaning are summarized in Table 11. Aroclor 1262 was detected in all samples from both pilot test areas. The PCB concentrations in the top 0.5 in. depth interval varied between 4.8 and 16.1 mg/Kg. The PCB concentrations in the 0.5 to 1.0 in. depth interval varied between 0.421 and 6.77 mg/Kg. No samples were collected below one inch after the solvent cleaning.

The percent reduction in PCB levels by the solvent cleaning varied between 14.3 and 82.4 percent for the upper 0.5 in. interval. The percent reduction in PCB levels by the solvent cleaning varied between -139 and +71.6 percent.

4.2.5 Wipe Samples

Twenty one PCB wipe-samples were collected for analysis from inside the building during the RFI. Results of the wipe sample analyses are summarized in Table 12. Sampling locations are shown on Figure 2. PCBs were detected at four locations throughout the building ranging in concentration from 1.1 to 7.5 ug/100 cm^2. All results are below the surface PCB Cleanup Level for unrestricted use of 10 ug/100 cm^2.

4.3 SECOND PCB PILOT TEST

Aroclor 1262 was detected in all samples from both pilot test areas. The PCB concentrations in the top 0.5 in. depth interval varied between 5.49 and 47.4 mg/Kg. The PCB concentrations in the 0.5 to 1.0 in. depth interval varied between 0.522 and 9.66 mg/Kg. No samples were collected below one inch after the solvent cleaning. Analytical results of samples collected after the solvent cleaning for the second PCB pilot test are summarized in Table 13. The location of the pilot test is shown on Figure 2. A discussion of the results of the pilot testing and feasibility of utilizing the solvent cleaning technology is provided in Section 5.9.

4.4 ADDITIONAL POROUS AND NON-POROUS SAMPLING

Analytical results for sampling of the miscellaneous porous materials in the building indicate PCB concentrations ranging from non-detect to 4,100 mg/Kg. Analytical results for samples of porous materials are summarized in Table 14. Four of the 21 porous samples had PCB concentrations above 50 mg/Kg. PCBs were not detected in five of the samples.

Analytical results for wipe sampling of the miscellaneous non-porous materials in the building indicate PCB surface concentrations ranging from non-detect to 38,000 ug/100 cm^2. Analytical results for wipe samples on non-porous materials are summarized in Table 15. Fifteen of the 32 samples that were collected are above the surface PCB Cleanup Level for unrestricted use of 10 ug/100 cm^2. PCBs were not detected in 17 of the wipe samples.

5.1 PCB SOURCE

The main source of PCBs is attributed to leakage of dielectric fluid from five transformers located inside the building. The exact timeframe of the leakage is unknown; however it likely that it occurred sometime after industrial activities ceased in 1985. From 1988 to 1989, the building was used for storage and repair of boats as well as general storage. During this time period, it is likely that leakage continued and the PCBs were spread throughout the building by vehicle and boat trailer tires or other equipment that came into contact with the fluid. Additionally, during the roof began to leak during this time period which likely caused further spreading across the building and into the drainage system.

In May 1999, CTDEP determined that the transformers were leaking. Under a removal action led by the CTDEP, the five transformers were removed from the building. The concentration of PCBs in the dielectric fluid is not well documented. It is assumed that the concentration was greater the 50 mg/L.

Recent sampling conducted in 2004 on non-porous surfaces also suggested that the overhead cranes are likely source of PCBs. This is discussed further in Section 5.8.

5.2 BUILDING INTERIOR CONCRETE AND UNDERLYING SOIL

During the Phase III ESA, 118 concrete samples (34 building-wide grid, 84 former transformer areas) were collected from the top 1-inch of the concrete slab for analysis according to the EPA-approved QAPP. As discussed in Section 3.1, the bottom 1-inch sample of the slab was analyzed if the top sample equaled or exceeded 1 mg/Kg. Based on this protocol, 105 samples of the bottom 1-inch of the concrete were analyzed. The soil sample collected from beneath the slab was analyzed if the bottom concrete sample exceeded 1 mg/Kg. Based on this protocol, twenty three soil samples were analyzed. The distribution of PCB concentrations in the soil and concrete above the cleanup level for High Occupancy Areas (1 mg/Kg) and the Residential Direct Exposure Criteria (RES DEC) (1 mg/Kg) is shown on Figure 4.

Based on the Phase III ESA results, the PCB levels within the top 1-inch of the concrete surface vary between non-detect to 11 mg/Kg away from the former transformer locations. At the transformers locations, the maximum levels in the top 1-inch were between 62 and 17,000 mg/Kg. Provided below is a summary of data for each transformer area and the building-wide grid.

Several additional borings were performed during the RFI to compliment the previous sampling. The PCB levels at those locations were higher than those at the nearby locations sampled during the Phase III ESA. The higher concentrations are attributed

in part to differences in sampling techniques. The previous sampling for the Phase III ESA collected either the top or bottom 1-inch of the concrete slab analysis. For the RFI, the top or bottom ½-inch was collected for analysis.

If the PCB contamination were predominantly surficial, then the 1-inch sample interval will tend to dilute the overall concentration. This dilution effect is demonstrated by the samples collected at the pilot test areas. The four corners of Pilot Test Area 1 were defined by the following four former locations: T1-12, T1-13, T1-17 and T1-18. The reported PCB levels within the top 1-inch were 19, 11, 2.6 and 3.8 mg/Kg, respectively, and the average concentration is 9.1 mg/Kg. Pilot Test Area 2 was centered about former location B-20. The reported PCB level within the top 1-inch at B-20 was 11 mg/Kg.

For the sampling conducted for the RFI, the PCB concentrations in the top 1-inch (average of the 0.0-0.5-inch and 0.5 to 1.0-inch sample) in Pilot Test Area 1 are 21.4, 14.9, 13.3 and 6.7 mg/Kg, and the average PCB concentration is 14.1 mg/Kg. The PCB concentrations in the top 1-inch (average of the 0.0-0.5-inch and 0.5 to 1.0-inch sample) in Pilot Test Area 2 are 10.7, 9.6, 15.9 and 9.3 mg/Kg, the average PCB concentration is 11.4 mg/Kg.

The Phase III ESA PCB average concentration of 9.1 and 11 mg/Kg compares well with the average PCB comparison for the RFI of 14.1 and 11.4 mg/Kg for Pilot Test Areas 1 and 2, respectively. Given this information and the depth profiling to two inches, the PCB concentrations above 10 mg/Kg are found in the top one inch of the concrete slab.

Provided below is a summary of concrete and soil sampling results for building interior concrete and soil based on the sampling conducted during the Phase III ESA and RFI. As indicated above, sampling during the Phase III ESA was performed on the top and bottom 1-inch of the concrete slab where as the top and bottom ½-inch were sampled during the RFI.

Location	Max. Top Sample Concentration/No. Samples above Cleanup Level (mg/Kg)	Max. Bottom Sample Concentration/No. Samples above Cleanup Level (mg/Kg)	Max Soil Sample Concentration/No. Samples above Cleanup Level (mg/Kg)	Depth of Soil Contamination above 1 mg/Kg (ft)
Transformer T1	150,000 / 21	43 / 5	1.1 / 3	4
Transformer T2	52,000 / 20	12.4 / 11	6.5 / 1	1
Transformer T3	62 / 21	4.6 / 1	0.53 / 0	NA
Transformer T4	171,000 / 21	16 / 3	ND	NA
Building-Wide Grid	39.4 / 29	7.78 / 6	1.3 / 1	1

5.3 DIOXIN-LIKE PCB COGENERS

During the RFI, samples of concrete were collected for the analysis of dioxin-like PCB congeners to determine whether or not the more toxic congeners existed in the impacted media. If the more toxic congeners were identified, it is likely that a risk-based cleanup level would have to be established in lieu of the cleanup level of 1 mg/Kg. The congeners that were detected include PCB 105, PCB 118, PCB 156, PCB 157, PCB 167 and PCB 189

The more toxic PCB dioxin-like congeners are PCB 126 and PCB 169. Both of these congeners were among the six congeners not detected in all three samples analyzed. Consequently, given the lack of detectable levels of the more toxic PCB congeners, it is concluded that the cleanup level of 1 mg/Kg is adequate from a risk perspective.

Due to the elevated total PCB concentrations, the minimum analytical detection limits (MDLs) for the various congeners were higher than expected. The question is whether or not the high MDLs are sufficient to meet the data quality objectives.

The reported MDLs result from the dilutions required during sample preparation to bring the concentrations into the calibrated range of values. For example, samples B-40 and B-42, exhibited total PCB Aroclor concentrations of 150,000 and 171,000 mg/Kg, respectively, and had the highest MDLs for the congeners of 120 and 110 mg/Kg, respectively. Sample PT-1-1 exhibited a total PCB Aroclor concentration of approximately four orders of magnitude less (35 mg/Kg), and the MDL was approximately three orders of magnitude less (0.1 mg/Kg) than the other two samples.

The MDLs are actually the "minimum reporting limits" (i.e. the minimum concentration within the calibration range). For several congeners, the concentrations listed on the report were actually below the MDL. These concentrations are estimates because they were below the calibration range and marked with a "J" flag on the laboratory report. Though below the reporting limit, the estimated concentrations reflect the ability to detect "trace" levels.

The congeners which are reported at concentrations below the MDL are PCB 105, PCB 157, PCB 167 and PCB 189. The estimated concentrations are approximately one order of magnitude below the listed MDL.

No estimated concentrations are reported for congeners PCB 126 or PCB 169. By inference, it is likely that congeners PCB 126 and PCB 169 are not detectable to approximately one order of magnitude below the MDLs.

5.4 FLOOR DRAIN AND STORM WATER DRAINAGE SYSTEM

Floor Drains, Manholes, and Catch Basins

PCB impacts are evident in the floor drains in the building interior. PCBs were detected in all 6 samples collected from the interior floor drains at concentrations ranging from 1.2 to 73 mg/Kg.

Limited or no PCB are present in the exterior drainage system. PCBs were only detected in one of the three manhole samples, at a concentration of 0.88 mg/Kg. PCBs were not detected in the one catch basin sampled.

Storm Water Outfalls

Limited PCB impacts were detected at the storm water outfall and former NPDES discharge point (SWO-3) on the Housatonic River. A small area of PCB impact above the cleanup level for High Occupancy Areas (1 mg/Kg) and the Residential Direct Exposure Criteria (RES DEC) (1 mg/Kg) is present as shown on Figure 5. No PCBs impacts were identified at the two outfalls (SWO-1 and SWO-2) on the West Aspetuck River.

5.5 SEDIMENT

No PCB impacts are evident in the sediments of the Housatonic River and the West Aspetuck River from sampling that was conducted in association with site investigations. Eight samples collected during the RFI did not contain any detectable levels of PCBs. Limited PCB impact is present on a storm water outfall and former NPDES discharge on the Houstonic River as discussed in the previous section.

5.6 GROUNDWATER

PCBs were not detected in any of the interior or exterior monitoring wells sampled during the Phase III ESA, RFI, or no-going RCRA groundwater monitoring. PCBs initially detected in monitoring wells MW-2003-3 and SD-2 are attributed to laboratory error. Re-analysis of these samples did not provide a confirmation of the PCB detections.

5.7 POROUS MATERIALS

The building is constructed of a steel frame and siding on a concrete slab. Porous materials discussed in this section pertain to debris (e.g. wood, cardboard, and paper) that is scattered throughout the building interior. Twenty one samples of representative porous materials were collected at locations throughout the building interior. Analytical results indicate PCB concentrations ranging from non-detect to 4,100 mg/Kg. Four of the 21 porous samples had PCB concentrations above 50 mg/Kg. PCBs were not detected in five of the samples.

The porous materials with PCB concentrations above 50 mg/Kg are located in the areas of the former transformers, except for a fiberglass ceiling panel located on the floor of the locker room. The source of PCB impact to the ceiling panel is likely due to a release from light ballast. The source for the other materials is inferred to be from contact with the PCB contaminated floor.

5.8 NON-POROUS MATERIALS

Twenty one PCB wipe-samples were collected during the RFI from inside the building on building interior walls and beams. Results of the wipe sample analyses are summarized in Table 9. PCBs were detected at four locations throughout the building at concentrations from 1.1 to 7.5 ug/100 cm^2. All results are below the surface PCB Cleanup Level for unrestricted use of 10 ug/100 cm^2.

Thirty two wipe-samples were collected from representative non-porous materials at locations throughout the building interior. Analytical results indicate PCB surface concentrations ranging from non-detect to 38,000 ug/100 cm^2. Fifteen of the 32

samples that were collected are above the surface PCB cleanup standard of 10 ug/100 cm^2. PCBs were not detected in 17 of the wipe samples.

All of the former overhead cranes in the building, except for two, were being dismantled by the previous property owner presumably for scrap. The two remaining cranes remain attached to the beams of the building. There are a number of crane pieces on the floor of the building that were being readied for transport off site. All of the wipe samples from these pieces were elevated with PCBs well above the cleanup level. Several oil lubrication reservoirs and gearboxes are still on the crane pieces. A number of these have leaked on the crane, likely over the years of operation. Wipe samples were collected from the leaking areas. The sample from a gearbox for an electric motor indicated a concentration of 26,700 ug/100 cm^2. Based on this result, the source of PCB contamination on the cranes is inferred to be the oil reservoirs and gearboxes on the cranes.

Other non-porous materials with PCB surface concentrations above the cleanup level include electrical cabinets associated with the former transformers, ceiling fans located on the floor, motorcycle, and duct work on floor. The source for this contamination is inferred to be the former leaking transformers. The electrical components were located close to the transformers and were likely contaminated by physical contact. Similarly, the ceiling fans, motorcycle, and duct work were likely contaminated in the same manner.

5.9 PILOT TESTS

Results of the pilot tests do not support a building-wide cleanup for PCBs using the solvent to meet the cleanup level. Results of the first pilot test were encouraging as they indicated a decrease in PCB levels but not to a concentration below the cleanup level. A second pilot test was conduced to determine if the PCB concentrations could be reduced further to this goal. Results for the second pilot test did not exhibit a continued decrease in PCB levels as was observed following the first pilot test.

The percent reduction following the second pilot test would have to be 90 percent in order for the solvent extraction to be effective. Only one sample achieved that level. Therefore, the conclusion from the second PCB pilot test is that the solvent cleanup is ineffective in achieving the cleanup goal.

6.1 HAZARDOUS BUILDING MATERIALS

6.1.1 Asbestos

Requirements for asbestos abatement are detailed in the technical bid specifications for this project entitled *Abatement, Phase I Source Removal, Century Enterprise Center.* The remediation contractor is required to abate the asbestos containing materials (ACM) identified in the specification. The waste from the abatement process in all areas of the building, except the former transformer areas and the locker room, will be handled and disposed of an asbestos and PCB Remediation Waste <50 mg/Kg at a non-TSCA facility. Waste derived from the former transformer areas and locker room will be handled and disposed of as an asbestos and PCB Remediation Waste >50 mg/Kg at a TSCA-permitted facility. Waste disposal procedures will be done in accordance with 40 CFR 761.61(a)(5) and other applicable asbestos regulations as defined in the technical bid specifications.

Water that is used during asbestos abatement will be collected, containerized, treated, and disposed of as a PCB Decontamination Fluid according to 40 CFR 761.79 and other applicable asbestos regulations as defined in the technical bid specifications.

The designated facilities for asbestos and PCB Remediation Wastes and Fluids are unknown at this time. The remediation contractor is required to propose the disposal facilities and plan for PCB Decontamination Fluids as part of their bid for the project. The plan and list of proposed disposal facilities will be provided to EPA for approval prior to award of the contract to the selected remediation contractor.

6.1.2 Miscellaneous

The chemicals and hazardous substances that remain in the building from former operations include several containers of waste oil, roof cement, anti-freeze, lacquer thinner, hydraulic fluid, torque fluid, kerosene, lubricating oil, NB-11, ND-22, 7D-24 fuel oil conditioner, and terressic 68. Miscellaneous chemicals are present at a former laboratory area in the boiler room. There is also a bank of batteries in the former electrical room and fluorescent lights in some areas of the building.

All materials will be collected, consolidated, and placed in the appropriate containers by the remediation contractor for off-site disposal as a CT-regulated waste, hazardous waste, or PCB Remediation/Liquid Waste as defined in RCSA 22a-449, 40 CFR 261, and 40 CFR 761, respectively. The exact waste classifications and disposal facilities are unknown at this time. The selected remediation contractor is required to submit a plan for characterization and disposal of the materials as part of their bid for the project. The proposed plan including the list of proposed disposal facilities will be

provided to EPA for approval prior to award of the contract to the selected remediation contractor.

6.2 FORMER TRANSFORMER AREAS

6.2.1 Concrete

The PCB-impacted concrete in the former transformer areas has been adequately characterized during previous investigations during the Phase III ESA and RFI to support a site cleanup. Furthermore, the data collected during these investigations support a cleanup level of 1 mg/Kg for High Occupancy Areas.

Figure 4 shows the extent of concrete that contains PCBs above the cleanup level for High Occupancy Areas (1 mg/Kg) and the Residential Direct Exposure Criteria (RES DEC) (1 mg/Kg). The contours on Figure 4 indicate PCB concentrations above the cleanup level in the top one inch of the concrete slab. The hatched areas indicate PCB concentrations above 10 mg/Kg in the bottom one inch of the concrete slab.

For Phase I Source Removal cleanup activities that are covered by this plan, the hatched areas shown on Figure 4 will be removed from the site. Structural support columns are present in the areas designated for remediation. Concrete will be removed to the extent practicable around the columns so as not to damage the columns, footings, and structural integrity of the building.

The PCB contamination in the top one inch of the concrete slab outside of the former transformer areas will be remediated during Phase II Cleanup activities which are not covered in this plan. Phase II cleanup activities may be conducted by the Town, if additional funding is secured, or by a developer.

The concrete will be excavated by a performance based method proposed by the selected remediation contractor. The excavated concrete will either be direct loaded or stockpiled inside the building for later transportation off the site to the designated disposal facility. If the later method is chosen, the concrete will be stockpiled on polyethylene sheeting to prevent contamination of less impacted concrete areas.

Excavated concrete will be handled and disposed of as a PCB Remediation Waste >50 mg/Kg at a TSCA-permitted facility. Waste disposal procedures will be done in accordance with 40 CFR 761.61(a)(5).

The designated facilities for PCB Remediation Wastes are unknown at this time. The remediation contractor is required to propose the disposal facilities as part of their bid for the project. A list of proposed disposal facilities will be provided to EPA for approval prior to award of the contract to the selected remediation contractor.

Concrete confirmation samples will be collected from the excavated areas depicted on Figure 4. Samples will be collected from the bottom one inch of the concrete slab along the edges of the excavation at 1.5 meter intervals and composited every 3 meters. Samples of the top of the concrete slab will not be collected since the top surface of the concrete outside of the former transformer areas will be addressed later in Phase II Cleanup.

Sampling procedures and laboratory analysis by EPA Method 8082 will be performed in accordance with the EPA-approved QAPP addendum dated February 2003.

If results of laboratory analysis indicated concentrations above 10 mg/Kg, then additional excavation will be conducted until this goal is achieved.

6.2.2 Soil

The PCB-impacted soil in the former transformer areas has been adequately characterized during previous investigations during the Phase III ESA and RFI to support a site cleanup. Furthermore, the data collected during these investigations support a cleanup level of 1 mg/Kg for High Occupancy Areas.

Figure 4 shows the areas of soil that contain PCBs above the cleanup level for High Occupancy Areas (1 mg/Kg) and the Residential Direct Exposure Criteria (RES DEC) (1 mg/Kg). These areas are located at former transformer areas T-1 and T-2 and core/boring B-4. For Phase I Source Removal cleanup activities that are covered by this plan, the soil areas will be excavated to the depths shown on Figure 4.

The soil will be excavated by a performance based method proposed by the selected remediation contractor. The excavated soil will either be direct loaded or stockpiled inside the building for later transportation off the site to the designated disposal facility. If the later method is chosen, the soil will be stockpiled on polyethylene sheeting to prevent contamination of concrete areas.

Excavated soil will be handled and disposed of as a PCB Remediation Waste <50 mg/Kg at a non-TSCA facility. Waste disposal procedures will be done in accordance with 40 CFR 761.61(a)(5).

The designated facilities for PCB Remediation Wastes are unknown at this time. The remediation contractor is required to propose the disposal facilities as part of their bid for the project. A list of proposed disposal facilities will be provided to EPA for approval prior to award of the contract to the selected remediation contractor.

Soil samples will be collected from the excavated areas at former transformer areas T-1 and T-2 and core/boring B-4 that are depicted on Figure 4. Samples will be collected

in accordance with 40 CFR 761.283. Specifically, the following number of samples will be collected from each of the areas:

- Former Transformer Area T-1: 6 samples
- Former Transformer Area T-2: 3 samples
- Core/boring B-4: 3 samples

Sampling procedures and laboratory analysis by EPA Method 8082 will be performed in accordance with the EPA-approved QAPP addendum dated February 2003.

If results of laboratory analysis indicated concentrations above 1 mg/Kg, then additional excavation will be conducted until the cleanup goal is achieved.

6.3 POROUS MATERIALS

The building is constructed of a steel frame and siding on a concrete slab. Porous materials discussed in this section pertain to debris (e.g. wood, cardboard, and paper) that is scattered throughout the building interior. Most of these porous materials are impacted with PCBs and therefore it is assumed that all porous materials will have to be disposed of as a PCB Remediation Waste. The porous materials with PCB concentrations above 50 mg/Kg are located in the areas of the former transformers, except for a fiberglass ceiling panel located on the floor of the locker room. The source of PCB impact to the ceiling panel is likely due to a release from light ballast.

Porous materials in the areas of the former transformers and locker room will be collected, consolidated, and placed in the appropriate containers by the remediation contractor for off-site disposal as a PCB Remediation Waste >50 mg/Kg at a TSCA-permitted facility. Porous materials in the remaining areas of the building will be handled and disposed of as a PCB Remediation Waste <50 mg/Kg at a non-TSCA facility. Waste disposal procedures will be done in accordance with 40 CFR 761.61(a)(5).

The designated facilities for PCB Remediation Wastes are unknown at this time. The remediation contractor is required to propose the disposal facilities as part of their bid for the project. A list of proposed disposal facilities will be provided to EPA for approval prior to award of the contract to the selected remediation contractor.

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Michael F. Zarba, P.E.
Public Works Director

April 17, 2015

Kimberly N. Tisa
Region 1 PCB Administrator
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Re: Modified Self-Implementing Phase III Remediation Plan for Century Enterprise Center Scovill Street, New Milford, CT

Dear Ms. Tisa:

Attached please find responses to the comments and questions the EPA raised in its April 2, 2015 review of the Modified Self Implementing Plan. In our response letter we have listed the question/comment and then provided the response directly after it; however in a few instances the response refers to an attachment or table which can be found at the end of the document. Additionally, we have provided a CD ROM with the September 2014 Interim Summary Report (ISR), including Appendix E which contains all of the previous sampling data. This information, in part, was relied upon to create the current (proposed) plan and should be part of the record for this notification.

We believe we have addressed all of the comments and issues raised in the initial review with these responses and additional information, however should there be any remaining issues or clarifications please do not hesitate to contact me by phone at (860) 355-6040 or by e-mail at mzarba@newmilford.org. Thank you for your time and attention in reviewing this project.

Sincerely,

Michael F. Zarba, P.E
Public Works Director

CC: Mr. Gary Trombly, CT DEEP (w/ CD ROM)
Patricia Murphy, Mayor
Ed Doubleday, TRC
File

1. *EPA was unable to reconcile data presented in the Interim Summary Report ("ISR") with the data provided in the Phase III Plan. For example, Figure 3 of the Phase III Plan shows a PCB concentration of 1.1 ppm for T-3-SB-I -SW-2. EPA also notes that the ISR narrative page 5-5 also indicates a 1.1 ppm PCB concentration at this sample location. However, the ISR Table 5 shows a PCB concentration of N D for this sample location. Please review and ensure all presented data is consistent and accurately reported.*

Given the nature of the project and the overall project scope, TRC prepared the Modified Phase III SIP in large part to be a continuation of the numerous previous investigations and remedial phases performed by Marin Environmental and Tighe & Bond. It was necessary for TRC to assume that applicable data had been accurately reported by Tighe & Bond, and from that point to address any noted inconsistencies on a case-by-case basis. With regard to the specific inconsistency cited by EPA, TRC had noticed that an exceedance of the 1 ppm criteria was identified in the ISR text (1.1 ppm at *T-3-SB-1-SW-3*) but no matching exceedance was identified in the accompanying ISR table (Table 5-3). TRC therefore assumed that the actual location containing 1.1 ppm PCBs was *T-3-SB-1-SW-2* as shown in the accompanying analytical laboratory report (which included a hand-marked confirmation of the sample designation) and, since the locations of exceedances were not called out on the figures or otherwise provided with coordinates, TRC assumed that the location of the sample containing 1.1 ppm corresponded to the location of T-3-SB-1-SW-2 shown on the ISR figure (Figure 5-3).

2. *Page 2. 2nd to last bullet. EPA' s records indicate that the Phase II PCB Remediation Plan was dated December 2006, not December 2004.*

EPA is correct that Tighe & Bond's Phase II Remediation Plan was dated December 2006. The citation indicating December 2004 is incorrect.

3. *Page 3. EPA does not understand how the caulks and other building materials were determined to be homogeneous and grouped. Please provide the criteria that was used for this effort. Please also be aware that depending upon the quantity of each type of buildi ng material present, three (3) samples may not be sufficient to confirm PCB concentrations. Thus, please also include the quantity (e.g. linear footage, etc.) of each product type present and its location. Please also see Comment 12, below*

Attachment 1 titled "Bulk Sampling Program Description" provides details of the PCB bulk sampling procedure utilized at the site. Table 7 (attached) is a summary of our PCB Bulk Sampling Results and Table 8 (attached) identifies the location and quantity of PCB containing materials.
There is only one PCB caulk type with a significant quantity, that is Caulk C4 (122,250 LF), identified in Tables 7 & 8 as a CTDEEP Regulated caulk (>1<50 ppm). At the site it is found in the pre-fabricated metal wall panels surrounding the entire factory floor. There is a vertical seam every foot with this caulk in it. Three samples were deemed enough for classification as an EPA Excluded Bulk Product/CTDEEP Regulated caulk as it is original material, there is no evidence of any other caulk, it is part of the pre-fabricated metal wall panel system and the data results of the three samples are consistent and well below 50ppm..

4. *A table with all sampling results and sorted by material type should be provided. Please also include copies of all analytical reports associated with samples supporting this project. While these data may have previously provided in other reports, the Phase III Plan is a stand-alone plan . Copies of the pertinent analytical reports may be provided on a CD-ROM.*

The data directly supporting this phase of the project primarily consists of the results of Phase I and II remedial actions by Tighe & Bond. Tighe & Bond's ISR presents and summarizes the applicable Phase I and II results in Table form. A copy of this report, including associated laboratory data, is provided herein as an attachment (on compact disk).

5. *Please clarify how the extent of removal (5-foot) at T4-6 was determined. The initial sampling grid was 50 feet. As such, samples may need to be collected directly outside the area of removal, to confirm < 50 ppm for purposes of removal of the surrounding concrete floor areas.*

Although areas exhibiting PCBs greater than or equal to 50 ppm were removed during Phase I activities, it appears that one such location (T4-6, in the electrical room) was left behind, and therefore needs to be addressed prior to milling of other, less contaminated areas. TRC considers that the electrical room floor slab has already been delineated by Tighe & Bond using 10-foot grids, as shown on the inset on TRC's Figure 1. Note that PCB concentrations significantly lower than 50 ppm were detected in grid points to the north, east, and south of T4-6. Given the obstacles (building walls and other features) which would have prevented contamination from being tracked in a western direction TRC believes that a 5 foot by 5 foot remediation area and corresponding verification sampling grid would be reasonable and appropriate. Based on the results of the verification sampling, the excavation area may be expanded. Ultimately all soils with PCBs greater than or equal to 50 ppm will be excavated until acceptable verification samples are collected.

6. *Page 5. The sequencing of PCB remediation requires clarification. On this page it appears to indicate that slab areas will first be milled followed by removal of limited sections of the slab. However Figure 3 and Page 9 appear to indicate that sections where slab removal is required will be implemented first, followed by milling of the floor. Please clarify.*

The statement on page 5 of the Modified Phase III SIP, indicating that slab section removal will be preceded by milling, is a general statement representing the majority of the work. The two planned exceptions are described in Section 2.5, and shown on TRC's Figure 3. To clarify the applicable text in the SIP, TRC is proposing pre-milling removal of a small slab section in the vicinity of sample T4-6 in the electrical room, and a large 40-foot wide swath of the lumber storage/box shop floor associated with samples B-35 through B-37. The removal of the large swath of floor slab was proposed as a potential way to reduce project costs by reducing the area to be milled, since milling alone will not address the PCB contamination in this area anyway (it has permeated too deeply into the slab in this area).

7. *Page 7. As previously requested, the sequencing of activities is requested. For example, EPA assumes that Item 6 cannot happen prior to Item 9. For Item 14, EPA assumes this activity could not happen unless the slab is removed , and all subslab and foundation PCB impacts are addressed. Please clarify.*

To further clarify the basis for the sequence, dropping the roof was proposed as a step prior to milling due to the current condition of the roof. As indicated in Section 1.1 of the Modified SIP, the building is currently considered unsafe for structural reasons principally related to the roof. The roof of the main building consists of concrete plank and membrane system supported on beams. The roof's integrity has been compromised over time, and concrete planks have fallen to the floor in many places, leaving roof openings and allowing further ongoing deterioration. Based on these conditions, the building is considered unsafe and unsound, as will be certified by the Town prior to demolition activities. Operation of excavation and milling equipment would further increase the potential hazards unless the roof was addressed beforehand.

8. *Please clarify if air monitoring will be conducted during abatement/slab removal. If so, what are the action levels and are these procedures listed in other documents? If air monitoring is not proposed, please clarify why.*

The bid documents for the project will include Technical Specifications requiring the Contractor to monitor air quality and mitigate dust. Action levels for the Contractor's personnel will be established in the Contractor's CIH or CSP-certified health and safety plan, which will address potential exposure to PCBs and certain other potential contaminants, as required. In addition, in the role as project inspector TRC will perform periodic dust monitoring in the Control Area immediately outside the Regulated/Containment Area prior to initiating a removal action, during performance of the action, and following the removal, which will include the break-down of the Regulated/Containment Area. For PCB-contaminated material removals monitoring will be performed for total suspended particulates (TSP). The background concentration within interior Control Areas will be determined prior to initiating remedial actions and a control area background level will be established. If, during the performance of air monitoring during removals, dust levels outside the Regulated/Containment Area are observed to increase by 20-percent over the background level determined prior to the remediation, the contractor shall be instructed to stop work and to inspect and reestablish, as necessary, the Regulated/Containment Area and associated engineering controls. The Contactor shall then be required to decontaminate the Control Area outside Regulated/Containment Area if it is found that the containment or engineering controls failed or were not functioning properly. For soil/surface cover excavation activities, the remedial contractor will be required to employ dust suppression measures, most likely watering, to prevent dust generation. It is not anticipated that OSHA limits for dust or PCB exposures will be approached. The dust suppression will be employed to prevent the potential release of PCBs to the surrounding environment and the contractor will be directed to employ dust suppression measures if any dust generation is observed.

9. *Page 8. Section 2.4.*

   a. *Currently, the Phase III Plan indicates that this equipment will be disposed at a non-TSCA permitted landfill. Please clarify the PCB surface concentrations on the cranes to allow disposal in a non-TSCA pem1itted disposal facility.*

   b. *It is indicated that in lieu of disposal, decontamination may be implemented in accordance with 40 CFR § 761.61(4)(iii). There is no such citation in the PCB regulations. Please amend for accuracy and clarity.*

   c. *If decontamination is chosen, please clarify the proposed decontamination standard and how the equipment will be disposed of if the decontamination standard is met. Please also clarify what is meant by the "performance-based method".*

For continuity, the references in Section 2.4 of the Phase III SIP to CFR 761.61(4)(iii) and a "performance-based method" were adopted from Tighe & Bond's approved Phase II SIP and the ISR which reported the results of Phase II.

Given the goal of legal offsite disposal or recycling of the overhead cranes, TRC believes that the most suitable options allowed in the regulations for crane bodies consist of: (a) disposal of the cranes at a suitable TSCA or non-TSCA waste facility, based on "as is", weight-based concentrations in the paint, to be measured by the Contractor at an acceptable frequency, (b) cleaning of the cranes by a performance-based method (e.g., stripping or abrasives) to NACE's Visual Standard No. 2, Near White Blast-Cleaned Surface Finish to allow unrestricted use or disposal, or (c) cleaning of the cranes to NACE's Visual Standard No. 3, Commercial Blast Cleaned Surface Finish to allow disposal in a smelter operating in accordance with 40 CFR 761.72(b). Please consider the Phase III SIP to be amended accordingly.

The selection of the actual methods of decontamination (if applicable) and disposal of the crane components will be based on economic considerations as part of the project bidding process. The Contractors will be directed to provide bid pricing for their intended methods, and the selected Contractor will be directed to submit proposed procedures for addressing the overhead cranes for EPA's review and approval, if appropriate (i.e., options (b) and (c) for the painted crane bodies do not require EPA approval, in accordance with 40 CFR 761.79(a)(1)).

10. *Page 9. Section 2.5.*

   a. *1st paragraph. Please clarify the extent of the area that will be removed to a 2- inch depth and also confirm that the area is associated with the T4-6 sample location.*

   b. *1st paragraph. It is indicated that once the less than ("<") 50 ppm PCB standard is achieved, excavated areas will be backfilled and/or re-capped with concrete, as needed.*

EPA does not understand why this area would be re-capped with concrete if PCB concentrations greater than (">") 1 ppm still remain as the 2nd paragraph indicates that milling will be conducted over the remainder of the floor with the objective of reaching a < 1 ppm PCB cleanup standard.

c. *The overall remedial goal for the concrete floor requires clarification as there is reference to both low occupancy area and disposal of concrete slab as construction & demolition ("C&D") waste. Thus, it is not clear what the proposed remed ial goal for the concrete floor is. EPA assumes that for soil, the proposed standard is < 1 ppm PCB; however, confirmation is requested.*

The EPA is correct that the area where the upper 2 inches of concrete is proposed to be removed is in the vicinity of T4-6. For reasons described in TRC's responses to Comment #5, the total area to be removed, subject to confirmation sampling, would be 25 square feet (a single 5-foot by 5-foot grid) and removal of this area is intended to address residual PCB contamination above 50 ppm which apparently was left behind during Phase I activities. Although some pits or openings in the floor in other parts of the building may be re-capped to facilitate smooth milling operations or limit infiltration in the absence of a roof (e.g., if there are underlying RCRA areas to be addressed in the future), TRC agrees that this small area should not need to be capped since localized underlying contamination is not anticipated to be present in the vicinity at this time. Therefore, the Contractor will not be directed to cap this area unless later determined to be necessary.

In any case, TRC would like to reaffirm that the overall remedial goal for the concrete floor, and for the project as a whole, is to achieve less than 1 ppm PCBs in materials, including soil, which may remain in the project area. The proposed strategy of area-wide floor slab milling, combined with targeted slab and foundation removal, is intended meet this goal and thereby reduce the overall project costs so that, if and when sufficient funds are available, the Town would be able to dispose of the remaining clean (<1 ppm PCBs) concrete as C&D waste instead of PCB remediation waste. The reference to a low occupancy area was included solely as a contingency, in case the 1 ppm goal could not be uniformly met as part of anticipated Phase III remediation activities. For example, milling is not expected to fully address PCB contamination in areas where it has penetrated deeply into the floor slab (at levels greater than 1 ppm but less than 50 ppm). If insufficient funds are available during Phase III to address these areas, then such areas may end up being left behind as part of a bare floor slab which, after milling, will not necessarily be sufficiently thick and uniformly clean versus depth profile to constitute a cap in accordance with 40 CFR 761.61(a)(4)(i)(B)(3) and 761.61(a)(7). The handling of such areas pending future remediation would depend in part on the concentrations left behind, but is not expected to require a fence around the area(s), as long as the PCB concentrations are below 25 ppm and/or deficiencies in the cap, if any, are addressed.

11. *Figures. It is not clear that EPA' s copy of the Phase III Plan contained the relevant figures. The figures EPA received were:*

    - *Figure 2: Areas of Soil and Concrete Excavation and Widespread Floor Confirmatory Sampling Locations (dated May 6, 2004)*
    - *Figure 2: Underground Utilities (dated February 19, 2003)*
    - *Figure 3: Proposed Areas for Additional PCB Remediation (January 21, 2015)*

    The Phase III Plan Table of Contents indicates the figures should be:

    - *Figure I : Location of Historical Samples and Proposed Post-Milling Floor Slab Samples*
    - *Figure 2: Floor Drains, Acid Lines and Other Underground Utilities*
    - *Figure 3: Proposed Areas for Additional PCB Remediation*

    Please clarify.

TRC would like to affirm their belief that the Phase III Plan submitted to the EPA contained the relevant figures. The figure titles listed in the Phase III SIP Table of Contents are correct, as they correspond to the TRC title blocks on each of the corresponding figures. TRC notes that, in addition to the TRC title blocks, TRC's Figure 1 and Figure 2 also retain the Tighe & Bond title blocks of the older Tighe & Bond figures on which they are closely based. This was done to credit the original source, since this project is an extension/continuation of prior Phase I and II PCB remediation activities, as well as the investigations which preceded them.

12. *It would be helpful if a Waste Table could be provided that provides information on waste management, including area of removal, estimated quantity of waste generated, waste classification and PCB Concentration, and proposed disposal facility.*

The following table provides the estimated quantities TRC included in the Engineers estimate for the project. It should be noted that the means and methods to be used for demolition are at the discretion of the contractor subject to appropriate approvals as detailed in the specifications and in these responses. The specific facility to be used will be at the discretion of the contractor as well and subject to appropriate approvals.

Waste Stream	Estimated Quantities	Facility	Source
PCB Remediation Waste >50 mg/Kg	1 tons	TSCA Facility	Slab (Base scope)
PCB Remediation Waste >50 mg/Kg	20 tons	TSCA Facility	Concrete, Soil and floor drain piping systems (optional scope if slab and/or drain system is removed)
PCB Remediation Waste <50 mg/Kg	680 tons	Non TSCA Facility	Slab and Foundations (Base scope)
PCB Remediation Waste <50 mg/Kg	16 tons	Non TSCA Facility	Soil (Base scope)
PCB Remediation Waste <50 mg/Kg	4 tons	Non TSCA Facility	Soil (optional scope if slab is removed)
Connecticut Regulated PCB Waste, (>1<50 mg/Kg)	1,800 CY	Facility which accepts state regulated PCB waste	Soil, Caulking and substrates (Base scope)
PCB Remediation Waste <50 mg/Kg	2,130 tons	Non TSCA Facility	Concrete from Milling Operation (Base scope)

13. Based on the information presented, it is unclear at this point, how much of the PCB remedial work remaining at this Site can be accomplished under the current available funding. Please provide details on the work outstanding, the estimated cost of the work, and the current funding available. If sufficient funds are not available to complete all PCB remedial work, what is the estimated timeline for work completion?

The Town of New Milford continues to work towards cleanup of various items at the Century Enterprise Center, which of course is dependent on available funds. We have previously worked with Tighe & Bond on a variety of cleanup activities for the site and they have reported these activities and results in a report titled "Interim Remedial Action Report" dated September 2014. In summary, there remains four AOC's and/or REC's (see 6-6 on page 6-3 of the report) that need to be dealt with to finish cleanup of the site.

As you may be aware the Town of New Milford has received a $2.5 Million grant from DECD to assist in the demolition and cleanup of the building and associated contaminants. We are currently working with and under contract with TRC Environmental Corporation to develop this demolition and cleanup plan,, part of which is this modified SIP. This plan and project is expected to take place in the spring and summer of 2015 and effectively will address two of the remaining items. The two items being addressed are PCB impacts in AOC 7 and asbestos containing materials (ACM) in the roof and the building interior.

The principle goal of this phase of the project is to safely demolish the structure and leave the facility in a safe condition which encourages future development. To this end, the goal is to achieve less than 1 ppm PCBs in accessible materials, including soil, which may remain in the project area defined as the footprint of the building. The proposed strategy of area-wide floor slab milling, combined with targeted slab and foundation removal, is intended to meet this goal. Additional options to be included in this competitive bid and to be accomplished subject to available funding, include:

- Removal of the floor slab
- Removal of the petroleum-impacted soil below AOC 10, the Boiler Room
- Removal of the floor drain system and acid lines within the building footprint
- Removal of PCB-contaminated soil exposed after slab removal

Based on TRC's Engineers Estimate, It is believed that these activities, including the optional work scope, may be performed within the available budget. This will be confirmed during the competitive bid process. Work actually performed will be subject to available funding.

As detailed in the T&B Interim Remedial Action Report, Section 6.3, additional remediation activities which remain to be performed are:

AOC 11 Floor Drains and Stormwater Drainage System

The floor drains and stormwater drainage system drain to three outflows which discharge to areas adjacent to the Housatonic River and the West Aspectuck River. Extensive sampling has been conducted in the vicinity of the outflows, the drains and discharge system, as well as the swale and cove areas. PCBs and metals have been detected in exceedance of CTDEEP RSR criteria and ecological risk-based standards and must be addressed.

Groundwater Monitoring

In order to successfully obtain closure status from the CTDEEP, a demonstration of consecutive groundwater analysis below CTDEEP RSR criteria is required after remediation is complete.

In addition, the RCRA CA must also be closed.

It is anticipated that the final cleanup of the last item, which is the soil and sediment at the outfall area will be completed by 12/30/2020.

A cost estimate for these two activities has not been developed.

Attachments

Sampling Program Description
Table 7 & 8 PCB Sample Results
Tighe & Bond Interim Remedial Action Report dated September 2014 (on Disk)
Tighe & Bond Data (on Disk)

1.0 SAMPLING PROGRAM DESCRIPTION

Initial building surveys and sampling were performed in October 2014 to categorize interior and exterior caulks and glazings at the Site. Subsequent to this sampling, additional investigations were performed to determine PCB concentrations within building materials adjacent to areas with Excluded PCB Products/State Regulated Products (>1<50 ppm) and to characterize the extent of impacts to soil or other surface cover materials that may have been affected by flaking or deteriorating State Regulated Products. In addition to this sampling, additional building survey and sampling work was performed to ensure that all caulks and glazings at the site were characterized and that their locations were known with a high level of accuracy.

All of the caulk and glazing analytical results are presented in Table 7 and identified PCB containing caulk and glazing are summarized in Table 8.

1.1 Bulk Product Building Material Sampling and Results

In October of 2014, TRC surveyed the Site and collected caulk and glazing samples pertaining to the demolition of the Century Enterprise Center. Sampling methodology generally involved collecting three (3) grab samples per homogenous material type identified, when feasible, by completely removing the caulk and the glazing from the location and inspecting to determine if there were any other materials present at the location. All caulks and glazings were determined to be original to construction were sampled separately.

Building surveys were performed following techniques generally employed in the Building Sciences industry to identify, locate and sample homogeneous building materials (i.e. Asbestos Hazard Emergency Response Act [AHERA] asbestos sampling guidelines). The Environmental Protection Agency (EPA) Methods 8082/3540C (PCB analysis with soxhlet extraction) were used for analysis at a State of Connecticut approved laboratory.

Based on the laboratory analytical results for the Bulk PCB samples, building materials were grouped into one of two categories as described in the sections which follow.

1.1.1 Excluded PCB Products/State Regulated Products

Building caulks and glazing were determined to be Excluded PCB/State Regulated Products if the in-situ total PCB concentration was >1 <50 ppm and if it could be determined that the caulk was original and that the total PCB concentration had not been modified by subsequent activities.

Thus, out of the seventeen (17) building caulks and glazing sampled, eleven (11) types of caulk or glazings (C2, C4, C5, C6, C7, C8, C9, WG2, WG4, WG5, DWG1) were determined to be State Regulated Products.

These caulks are original and they will be disposed of as a State Regulated Product in a landfill permitted to receive such wastes. Refer to Tables 7 & 8 for more detailed information.

1.1.2 Excluded PCB Products/Non-Regulated Products

Building caulks and glazing were determined to be Federally Excluded PCB Products/Non-Regulated PCB Products if the in-situ total PCB concentration was <1 ppm and if it could be determined that the caulk was original and that the total PCB concentration had not been modified by subsequent activities. Of the seventeen (17) building caulks and glazings sampled, six (6) were determined to be Excluded/Non-State Regulated Product (C10, C11, WG1, WG3, WG5, WG7).

Refer to Tables 7 & 8 for more detailed information. These Excluded/Non-Regulated Products will not be discussed further.

TABLE 7
BULK SAMPLE SUMMARY OF SUSPECT PCB CONTAINING MATERIALS
CENTURY ENTERPRISE CENTER
NEW MILFORD, CONNECTICUT

Sample No.	Homogenous Material Type	Sample Location	Total PCB (ppm)	EPA/CTDEEP Regulated
1	C2-white, hard caulk♦	Laboratory 5	1	Yes - CTDEEP
2		Laboratory 5	3.4	
3		Laboratory 5	2	
4	C4-tan soft, pliable caulk♦	Manufacturing – A-wall	3.9	Yes - CTDEEP
5		Manufacturing – B-wall	9.3	
6		Manufacturing – C-wall	ND<0.73	
7	C5-black pliable caulk♦	Wood shop 2	2.9	Yes - CTDEEP
8		Wood shop 2	4.7	
9		Wood shop 2	2.4	
10	C6-hard tan caulk♦	Wood shop 1	7.3	Yes - CTDEEP
11		Wood shop 1	5.3	
12		Wood shop 1	3.4	
13	C7-hard tan door caulk ♦	Manufacturing – garage door B-side	15	Yes - CTDEEP
14		Manufacturing – B-side	12	
15		Manufacturing – garage door B-side	11	
16	C8-white semi-pliable caulk♦	Machine shop	7.6	Yes - CTDEEP
17		Manufacturing 2	1.4	
18		Manufacturing 2	1.3	
19	C9-hard, grey window caulk♦	Exterior – Boiler Room	0.99	Yes - CTDEEP
20		Exterior – large Locker Room	1.1	
21		Exterior – offices	ND<0.81	
22	C10-light grey crumbly caulk♦	Exterior – D-side	ND<0.83	No
23			ND<0.74	
24	C11-hard tan expansion joint caulk ♦	Exterior – boiler room	ND<0.79	No
25		Exterior – boiler room	ND<0.78	
26		Exterior – boiler room	ND<0.79	
27	WG1 – exterior gray glaze on metal window ♦	Exterior – offices	ND<0.73	No
28		Exterior – large locker room	ND<0.73	
29		Exterior – area 51	ND<0.77	

ND< = Below Detection Limit
PCB ≥ 50 ppm = EPA PCB Bulk Product Waste
PCB >1 ppm but <50 ppm = CTDEEP regulated

♦ Asbestos containing material (>1%)

TABLE 7
BULK SAMPLE SUMMARY OF SUSPECT PCB CONTAINING MATERIALS
CENTURY ENTERPRISE CENTER
NEW MILFORD, CONNECTICUT

Sample No.	Homogenous Material Type	Sample Location	Total PCB (ppm)	EPA/CTDEEP Regulated
30	WG2- white glaze on interior metal panel windows♦	Area 51	15	Yes - CTDEEP
31		Area 51	13	
32		Area 51	16	
33	WG3-exterior grey glaze on 20-pane metal windows♦	Exterior – boiler room	ND<0.75	No
34		Exterior – boiler room	ND<0.73	
35		Exterior – boiler room	ND<0.74	
36	WG4-cream glaze on wood window	Manufacturing 2	4.4	Yes - CTDEEP
37		Manufacturing 2	ND<0.73	
38		Manufacturing 2	1	
39	WG5-thin white glaze on wood windows♦	Manufacturing office 1	3.1	Yes - CTDEEP
40		Manufacturing office 1	4.2	
41		Manufacturing office 1	3.5	
42	WG6-hard grey glaze on single pane metal window♦	Exterior – offices	ND<0.82	No
43		Exterior – offices	ND<0.76	
44		Exterior – guard shack	ND<0.83	
45	WG7-interior hard grey glaze on 24 –pane metal window	Boiler Room	ND<0.77	No
46		Boiler Room	ND<0.81	
47		Boiler Room	1	
48	DWG1-grey putty door window glaze on metal door♦	Manufacturing 2	2.5	Yes - CTDEEP
49		Manufacturing 2	3	
50		Manufacturing 2	4.3	

ND< = Below Detection Limit
PCB ≥ 50 ppm = EPA PCB Bulk Product Waste
PCB >1 ppm but <50 ppm = CTDEEP regulated

♦Asbestos containing material (>1%)

TABLE 8
IDENTIFIED PCB CONTAINING MATERIALS
CENTURY ENTERPRISE CENTER
NEW MILFORD, CONNECTICUT

Material	Sample Date (mo/yr)	General Location	Estimated Quantity
CTDEEP REGULATED PCB CONTAINING MATERIALS (> 1 ppm, < 50 ppm)			
C2-white, hard caulk♦	Sampled 10/14	Machine room (duct unit), Laboratory 5(window)	28 LF
C4-tan soft, pliable caulk♦	Sampled 10/14	Manufacturing, manufacturing 1 & 2, wood shop 1 & pump station - metal wall paneling	122,250 LF
C5-black pliable caulk♦	Sampled 10/14	Wood shop 2	1,100 LF
C6-hard tan caulk♦	Sampled 10/14	Wood shop 1 (residual on wall)	60 LF
C7-hard tan door caulk ♦	Sampled 10/14	Manufacturing – B-side	50 LF
C8-white semi-pliable caulk♦	Sampled 10/14	Machine shop(garage door), Manufacturing 2	70 LF
C9-hard, grey window caulk♦	Sampled 10/14	Exterior – around windows, doors, décor of guard shack, offices, bathroom 2, laboratory 2,4 & 5, large locker room, area 51, machine shop and boiler room	1,050 LF
WG2- white glaze on interior metal panel windows/doors♦	Sampled 10/14	Offices, Area 51	11 EA
WG4-cream glaze on wood window	Sampled 10/14	Manufacturing 2	2 EA
WG5-thin white glaze on wood windows♦	Sampled 10/14	Manufacturing - office 1 & 2	16 EA
DWG1-grey putty door window glaze on metal door♦	Sampled 10/14	Manufacturing 2	2 EA

♦ Asbestos containing material (>1%)

Mike Zarba <mzarba@newmilford.org>

Fwd: Interim Remdial Action Report

1 message

Mike Zarba <mzarba@newmilford.org> Fri, Jun 12, 2015 at 8:18 AM
To: "Tisa, Kimberly" <Tisa.Kimberly@epa.gov>
Cc: "Trombly, Gary" <Gary.Trombly@ct.gov>, "Doubleday, Edward" <EDoubleday@trcsolutions.com>

Good Morning Kim:

Please find attached the reply and revised IRAR pages from Jim Olsen at Tighe & Bond in reference to comment # 1 of your April 2, 2015 review. This confirms your original finding that this sample location was inconsistent in the original report. Please replace the two pages with the revised updated pages attached hereto.

I believe this was the last bit of information you were looking for in reference to your original review, however if you need any additional information please do not hesitate to contact me.

Again, thank you for your time and attention in reviewing this project. Take Care,

Michael F. Zarba, P.E.
Public Works Director
Town of New Milford
(860) 355-6040 phone
(860) 355-6055 fax
www.newmilford.org

---------- Forwarded message ----------
From: **James T. Olsen** <JTOlsen@tighebond.com>
Date: Thu, Jun 11, 2015 at 7:10 PM
Subject: RE: Interim Remdial Action Report
To: Mike Zarba <mzarba@newmilford.org>

Hi Mike,

Sorry for delay on this. You are correct and that is a mistake. Attached are the revised pages.

Please let me know if you need anything else.

Jim

From: Mike Zarba [mailto:mzarba@newmilford.org]
Sent: Tuesday, April 21, 2015 1:56 PM
To: James T. Olsen
Subject: Interim Remdial Action Report

Jim:

As we discussed can you please confirm that the appropriate information is contained in the IRAR and/or update the appropriate information as follows?

EPA had commented about an inconsistency of data presented in that report. Specifically regarding a test sample (T-3-SB-1-SW-2) which is referenced on page 5-5 of your narrative as T-3-SB-1-SW-3 - I believe that should reference T-3-SB-1-SW-**2**. The narrative states that this sample exceeded the 1.0 mg/Kg limit at 1.1 mg/Kg, however the corresponding table (Table 5-3) shows a ND for this sample.

I included scans of the three pages and have highlighted the areas that I believe need confirmation and/or updating. Again can you please check this information and issue the appropriate changes, if necessary.

Please let me know if you have any questions.

Thank You,

Michael F. Zarba, P.E.

Public Works Director

Town of New Milford

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2 attachments

Revised Page 5-5.pdf
31K

Revised Page 2 of Table 5-3.pdf
23K